23 September 2009

Mr. Alan DeSalvio Air Quality Engineer Mojave Desert Air Quality Management District 14306 Park Avenue Victorville, California 92392-2310

Subject: Title V Renewal Application Package

Marine Corps Logistics Base (MCLB) Barstow, Yermo Annex

Dear Mr. DeSalvio:

Attached please find a copy of the following documents, which are submitted in support of the MCLB Barstow request to renew the Title V Permit for the Yermo Annex facility (Permit 08700587):

- 1. Enclosure 1 MDAQMD Form 1202-A Submission Certification.
- Enclosure 2 Copy of Title V Permit with Proposed Revisions. The revisions are made in track changes.
- 3. Enclosure 3 Title V Permit Table of Requested Revisions. The table explains the requested revisions to the Title V Permit and the justification for those changes.
- 4. Enclosure 4 Compliance Assurance Monitoring Plan Supporting Documentation.

Thank you for your time and consideration. If you have any questions on the recommended changes, please do not hesitate to contact the base Air Program Manager, Suzy Knutson at 760-577-6413 or by email at suzanne.knutson@usmc.mi, or Massie Hatch of URS Group Inc at (714) 433-7710.

Sincerely,

Joseph L. Cook Enclosures



SUBMISSION CERTIFICATION (MDAQMD FORM 1202-A)

SUBMISSION CERTIFICATION

(Please Print or Type)

I, $\underline{\underline{\text{Joseph L. Cook}}}_{\text{(Name of Official)}}$, a responsible official of

Marine Corps Logistics Base Barstow, hereby certify that, based
upon information and belief formed after a reasonable inquiry, the
following information, consisting of MDAQMD Title V Permit Renewal
Application Package (166 Pages), is true, accurate and complete.

Executed this _____ day of _____, 2009 at

San Bernardino County, California.

(Signature)

Joseph L. Cook

Director, Environmental Division

(Name and Title)

Name of Facility: Marine Corps Logistics Base Barstow

Mailing Address: COMMANDING OFFICER, ENVIRONMENTAL

Box 110196,

City/State/Zip: Barstow, CA 92311-5050

This Form is required to be completed and attached to all Federal Operating Permit and Rule 221 submittals to the MDAQMD pursuant to MDAQMD Rule 1208. Submissions which do not contain this form will be rejected.



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

Federal Operating Permit Number: 08700587

For: YERMO ANNEX

Facility: MARINE CORPS LOGISTICS BASE

BARSTOW, CALIFORNIA

Issued Pursuant to MDAQMD Regulation XII Effective Date: March 24TBD, 2005-2010

•SEE TITLE V PAGE 2 FOR PERMIT REVISION SUMMARY•

This Federal Operating Permit Expires March 24TBD, 2010-2015

Issued By: Eldon Heaston Executive Director

PERMIT REVISIONS

August 7, 2007 Administrative Permit Amendment described as follows:

(Modified by Samuel Oktay)

Update page 2 revisions.

Updated Title V Permit Sections I and III to reflect new District Permits: S009969 and C009968.

August 10, 2006 Significant Permit Modification described as follows: (modified by Bill)

Revise Title Page to reference page 2 for permit modification summaries.

Update Executive Director/APCO changes.

Update page 2 revisions.

Updated Title 5 permit Sections I and III to reflect new District Permits: S009622 and C009623.

July 20, 2005 Significant Permit Modification described as follows:

Revise Title Page to reference page 2 for permit modification summaries.

Insert new page 2 and added detailed summaries for previous and current Title 5 changes.

Updated Title 5 permit Sections I and III to reflect new District Permits: A009130, A009131, C009132, and C009133.

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PART I INTRODUCTORY INFORMATION

A. <u>FACILITY IDENTIFYING INFORMATION:</u>

Owner/Company Name: United States Marine Corps (USMC)

Owner Mailing Address: COMMANDING OFFICER

Marine Corps Logistics Base

Attn: S. Knutson

Environmental Division Box-110170110196, Bldg 196 Barstow, CA 92311-5050

<u>Facility Name:</u> USMC Yermo Annex

<u>Facility Location</u>: USMC Logistics Base, Barstow, CA

Mojave Desert Air Quality Management District

(MDAQMD) Federal Operating Permit Number: 08700587

MDAQMD Company Number: 0087

MDAQMD Facility Number: 00587

Responsible Official: S. J. Thompson D.P. Ermer, Colonel USMC

<u>Title:</u> Commanding Officer <u>Phone Number:</u> (760) 577-6555

Alternate Responsible Official: Joseph L. Cook

Title: Director, Environmental Division

Phone Number: (760) 577-5931

Facility "Site" Contacts:

Ms. Suzy Knutson

<u>Title</u>: MCLB Air Compliance Program Manager

<u>Phone Number:</u> 760-577-6413

Nature of Business: National Security

<u>SIC Code</u>: 9711

<u>Facility Location</u>: Barstow, California

I -1 Enclosure 2

B. <u>EQUIPMENT DESCRIPTION:</u>

<u>LISTED AS: MDAQMD PERMIT # / EQUIPMENT DESCRIPTION</u> (Detailed Equipment Description and Permit Conditions Listed in Part III)

A000951	ABRASIVE BLAST BOOTH
A000952	ABRASIVE BLAST BOOTH
A003915	ABRASIVE BLASTING SYSTEM
A003959	ABRASIVE BLASTING SYSTEM
A004412	ABRASIVE BLASTING CABINET
A005014	ABRASIVE BLASTER, ROTARY
A005015	ABRASIVE BLASTER ROTARY
A005113	ABRASIVE BLAST BOOTH
A008793	ABRASIVE BLAST BOOTH
A009130	SUPER BLAST BOOTH ONE (NORTH OF BLDG 573-BLDG 565)
A009131	SUPER BLAST BOOTH TWO (NORTH OF BLDG 573_BLDG 565)
B000935	BOILER #7
B000936	BOILER #8
B000937	BOILER # 9
B002875	PAINT DRYING OVEN
B003969	DYNAMOMETER TEST STAND
B004194	VEHICLE UNDERCOATING COMPLEX
B004397	DYNAMOMETER # 1
B004398	DYNAMOMETER # 2

	B004399	DYNAMOMETER # 3
	B004400	DYNAMOMETER # 4
	B004401	SPIN TEST # 5
	B004402	DYNAMOMETER # 6
	B004403	DYNAMOMETER # 7
	B004496	AIR STRIPPER
	B004499	OIL-WATER SEPARATORS NO. I AND NO. II
	B004500	OIL-WATER SEPARATOR
	B004753	VEHICLE UNDERCOATING RACK
	B008746	WASTEWATER TREATMENT PLANT/RECYCLING FACILITY
	B008890	PAINT PYROLYSIS OVEN
	B008921	TRAY STRIPPER AERATION UNIT
	C003245	DUST COLLECTOR
	C003247	DUST COLLECTOR
	C003961	DUST COLLECTOR
	C004497	THERMAL OXIDIZER
	C004498	-CAUSTIC SCRUBBER
I	C004561	AIR POLLUTION CONTROL SYSTEM
	C005009	HEPA VAC
	C005010	HEPA VAC
	C005012	HEPA VAC

C005090	<u>ULTRAVIOLET OXIDATION SYSTEM</u> <u>ADVANCED OXIDATION PROCESS</u> (AOP) MODULE
C008397	REGENERATIVE THERMAL OXIDIZER (BLDG 634)
C008808	DUST COLLECTOR
C009132	DUST COLLECTOR (NORTH OF BLDG 573)
C009133	DUST COLLECTOR (NORTH OF BLDG 573)
C009623	RECUPERATIVE THERMAL OXIDIZER (BLDG 634)
C009968	REGENERATIVE THERMAL OXIDIZER (BLDG 634)
C010219	DUST COLLECTOR
C010410	DUST COLLECTOR
D005319	SOLVENT VAPOR DEGREASER
E003845	DIESEL IC ENGINE, EMERGENCY ELECTRICITY GENERATOR
E004391	EMERGENCY INTERNAL COMBUSTION ENGINE
E004392	DIESEL IC ENGINE, EMERGENCY ELECTRICITY GENERATOR
E004501	DIESEL IC ENGINE, EMERGENCY GENERATOR
E005003	DIESEL IC ENGINE, EMERGENCY GENERATOR
E005016	DIESEL IC ENGINE, EMERGENCY AIR COMPRESSOR (#1)
E005017	DIESEL IC ENGINE, EMERGENCY AIR COMPRESSOR (#2)
E009529	DIESEL IC ENGINE, EMERGENCY GENERATOR (BLDG 558)
E005337	PROPANE IC ENGINE, EMERGENCY GENERATOR
E005338	PROPANE IC ENGINE, EMERGENCY GENERATOR

E008109	PROPANE IC ENGINE, EMERGENCY GENERATOR
E008110	PROPANE IC ENGINE, EMERGENCY GENERATOR
E008334	NATURAL GAS IC ENGINE, EMERGENCY GENERATOR
S002872	PAINT SPRAY BOOTH
S002873	PAINT SPRAY BOOTH
S002876	FINAL COAT BOOTH
S004558	PAINT SPRAY BOOTH
S008392	BASE COAT BOOTH NO.1
S008393	BASE COAT BOOTH 4 WITH CURING OVEN
S008394	BASE COAT BOOTH 8 WITH CURING OVEN
S008395	PRIME COAT BOOTH 10 WITH CURING OVEN
S008396	PRIME COAT BOOTH 3 WITH CURING OVEN
S009622	PAINT SPRAY BOOTH (BLDG 634)
S009969	PAINT SPRAY BOOTH (BLDG 634)
T003092	DIP TANK # 11
T003093	DIP TANK # 14
T003095	DIP TANK # 16
T003374	DIP TANK # 5
T003376	DIP TANK # 2
T003377	DIP TANK # 4
T003378	DIP TANK # 10

T003379	DIP TANKS # 12
T003861	GASOLINE STORAGE TANK
T003926	INDUSTRIAL WASTE WATER TANK
T003927	INDUSTRIAL WASTE WATER TANK
T003929	INDUSTRIAL WASTE WATER TANK
T004671	DIP TANK #8
T005118	UNDERGROUND <u>DIESEL</u> STORAGE TANK
T005251 T005252	PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK
T005253	PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK
T005254	PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK

PART II

FACILITY-WIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; AND COMPLIANCE PLANS

A. REQUIREMENTS APPLICABLE TO ENTIRE FACILITY AND EQUIPMENT:

- 1. A permit is required to operate this facility.

 [Rule 203 *Permit to Operate*; Version in State Implementation Plan (SIP) <u>Approved 11/9/78</u>, = California Air Resources Board (CARB) Ex. Order G-73, 40 Code of Federal Regulations (CFR) 52.220(c)(39)(ii)(B) <u>and 40 CFR 52.220(c)(31)(vi)(C) -11/09/78</u>, 43

 Federal Register (FR) 52237; Current Rule Version = 07/25/77]
- The equipment at this facility shall not be operated contrary to the conditions specified in the District Permit to Operate.
 [Rule 203 Permit to Operate; Version in SIP Approved 11/09/78, = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C) —11/09/78, 43 FR 52237; Current Rule Version = 07/25/77]
- 3. The Air Pollution Control Officer (APCO) may impose written conditions on any permit. [Rule 204 *Permit Conditions*; Version in SIP <u>Approved 11/09/78</u>, = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C), —11/09/78-43 FR 52237; Current Rule Version = 07/25/77]
- Commencing work or operation under a permit shall be deemed acceptance of all the conditions so specified.
 [Rule 204 Permit Conditions; Version in SIP Approved 11/09/78,= CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C)-11/09/78, 43 FR 52237; Current Rule Version = 07/25/77]
- 5. Posting of the Permit to Operate is required on or near the equipment or as otherwise approved by the APCO/District.

 [Rule 206 *Posting of Permit to Operate*; Version in SIP <u>Approved 11/09/78 = CARB Ex. Order G-73</u>, 40 CFR 52.220(c)(39)(ii)(B) <u>and 40 CFR 52.220(c)(31)(vi)(C)</u>, <u>11/09/78-43 FR 52237</u>; Current Rule Version = 07/25/77]
- Owner/Operator shall not willfully deface, alter, forge, or falsify any permit issued under District rules.

[Rule 207 - Altering or Falsifying of Permit; Version in SIP — Approved 11/09/78, = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) and 52.220(c)(31)(vi)(C)— 11/09/78, 43 FR 52237; Current Rule Version = 07/25/77]

- 7. Permits are not transferable.
 - [Rule 209 *Transfer and Voiding of Permit*; Version in SIP_ Approved 11/09/78 = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) -and 40 CFR 52.220(c)(31)(vi)(C)-11/09/78 43 FR 52237; Current Rule Version = 07/25/77]
- 8. The APCO may require the owner/operator to provide and maintain such facilities as are necessary for sampling and testing.

 [Rule 217 Provision for Sampling And Testing Facilities; Version in SIP _ Approved 11/09/78 = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)(31)(vi)(C), -02/01/77-43 FR 52237; Current Rule Version = 07/25/77]
- 9. The equipment at this facility shall not require a District permit or be listed on the Title V permit if such equipment is listed in Rule 219 and meets the applicable criteria contained in Rule 219 (B). However, any exempted insignificant activities/equipment are still subject to all applicable facility-wide requirements.

 [SIP Pending: Rule 219 Equipment Not Requiring a Written Permit as Amended on 4/25/05; Submitted as amended 10/23/00 on 10/30/01; Submitted as amended on 12/21/94 on 1/24/95; Submitted as amended 11/25/91 on 1/28/92; Prior version in SIP Approved 11/09/78 = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B)-) and 40 CFR 52.220(c)(31)(vi)(C), -11/09/78 43 FR 52237; Current Rule Version = 4/25/05]
- 10. The owner/operator of this facility shall obtain a Federal Operating Permit for operation of this facility.

 [Rule 221 Federal Operating Permit Requirement; Version in SIP_Approved 2/5/96 = Current, 40 CFR 52.220(c)(216)(i)(A)(2), -02/05/96-61 FR 4217; Current Rule Version = 12/21/94]
 - 11. Owner/operator shall pay all applicable MDAQMD permit fees.

 [Rule 301 *Permit Fees*; = <u>CARB Ex. Order G-73</u> Applicable Version = 10/23/94,

 Applicable via Title V Program interim approval 02/05/96, 61 FR 4217; <u>Current Rule</u>

 Version = 6/23/2008 applicable 1/1/2009]
 - 12. Owner/Operator shall pay all applicable MDAQMD Title V Permit fees.

 [Rule 312 Fees for Federal Operating Permits; Applicable Version = 10/23/12/2194,
 Applicable via Title V Program interim approval 02/05/96, 61 FR 4217]

- 13. Stack and point source visible emissions from this facility, of any air contaminant (including smoke) into the atmosphere, shall not equal or exceed Ringelmann No. 1 for a period or periods aggregating more than three minutes in any one hour:
 - (a) While any unit is fired on Public Utilities Commission (PUC) grade natural gas, Periodic Monitoring for combustion equipment is not required to validate compliance with the Rule 401 Visible Emissions limit. However, the owner/operator shall comply with the recordkeeping requirements stipulated elsewhere in this permit regarding the logging of fuel type, amount, and suppliers' certification information.
 - (b) While any unit is fired on diesel fuel, Periodic Monitoring, in addition to required recordkeeping, is required to validate compliance with Rule 401 Visible Emissions limit as indicated below:
 - (i). Reciprocating engines equal or greater than 1000 horsepower, firing on only diesel with no restrictions on operation, a visible emissions inspection is required every three (3) months or during the next scheduled operating period if the unit ceases firing on diesel/distillate within the 3-month time frame.
 - (ii). Diesel Standby and emergency reciprocating engines using California low sulfur fuels require no additional monitoring for opacity.
 - (iii). Diesel/Distillate-Fueled Boilers firing on California low sulfur fuels require a visible emissions inspection after every 1 million gallons diesel combusted, to be counted cumulatively over a 5-year period.
 - (iv). On any of the above, if a visible emissions inspection documents opacity, an U.S. Environmental Protection Agency (EPA) Method 9 "Visible Emissions Evaluation" shall be completed within 3 working days, or during the next scheduled operating period if the unit ceases firing on diesel/distillate within the 3 working day time frame.

[Rule 204 - *Permit Conditions*; Version in SIP <u>Approved 11/09/78</u> = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) <u>and 40 CFR 52.220(c)(31)(vi)(C)</u>—11/09/78—, 43 FR 52237; Current Rule Version = 07/25/77]

[Rule 401 - Visible Emissions; Version in SIP = CARB Ex. Order G-73, 40 CFR $52.220(c)(39)(ii)(\frac{BC}{2}) - 09/08/78$, 43 FR 40011; Current Rule Version = 07/25/77] [40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements]

14. Owner/Operator is limited to use of the following quality fuels for fuel types specified elsewhere in this permit: PUC quality natural gas fuel - sulfur compounds shall not exceed 800 parts per million (ppm) calculated as hydrogen sulfide at standard conditions; diesel fuel - sulfur content shall not exceed 0.5 percent by weight. Compliance with Rule 431 fuel sulfur limits is assumed for PUC quality natural gas fuel and CARB certified diesel fuel. Records shall be kept on-site and available for review by District, state, or federal personnel at any time. The sulfur content of non-CARB certified diesel fuel shall

be determined by use of American Society for Testing and Materials (ASTM) method D 2622-82 or ASTM method D 2880-71, or equivalent.

[40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements]

[Rule 431 - Sulfur Content of Fuels; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 09/08/78₂- 43 FR 40011, 40 CFR 52.220(c)(37)(I)(B); Current Rule Version = 07/25/77]

- 15. Emissions of fugitive dust from any transport, handling, construction, or storage activity at this facility shall not be visible in the atmosphere beyond the property line of the facility. [Rule 403 *Fugitive Dust*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) 09/08/78, 43 FR 40011, 43 FR 25684, 40 CFR 52.220(c)(32(iv)(A) 6/14/78; Current Rule Version = 07/25/77]
- 16. Owner/Operator shall comply with the applicable requirements of Rule 403.2 unless an "Alternative PM₁₀ Control Plan" (ACP) pursuant to Rule 403.2(G) has been approved. [SIP Pending: Rule 403.2 Fugitive Dust Control for the Mojave Desert Planning Area as amended 07/31/95 and submitted 10/13/95 submitted as adopted 7/22/96 on 10/18/96; Current Rule Version = 07/22/96]
- 17. Owner/Operator shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).
 - (a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.
 - (b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.
 - (c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

[Rule 404 - Particulate Matter Concentration; Version in SIP - Approved 12/21/78 = Current 40 CFR 52.220(c)(42)(xiii)(A)₂ - 12/21/78 43 FR 52489; Current Rule Version 7/25/77]

- 18. Owner/Operator shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a).
 - (a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
 - (b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

[Rule 405 - *Solid Particulate Matter, Weight*; Version in SIP <u>- Approved 12/21/78</u> = Current, 40 CFR 52.220(c)(42)(xiii)(A), <u>- 12/21/78</u> 43 FR 52489, <u>Approved 6/14/78</u> = 43 25684, 40 CFR 52.220(c)(32(iv)(A); Current Rule Version 7/25/77]

- 19. Owner/Operator shall not discharge into the atmosphere from this facility, from any single source of emissions whatsoever, sulfur compounds, which would exist as a liquid or gas at standard conditions, calculated as sulfur dioxide (SO₂), greater than or equal to 500 ppm by volume.
 - [Rule 406 *Specific Contaminants*; Version in SIP = 07/25/77, 40 CFR 52.220(c)(42)(xiii)(A) 12/21/78, 43 FR 5248952486, Subpart (a) only; Current Rule Version = 02/20/79]
- 20. Owner/Operator shall not discharge into the atmosphere from this facility, carbon ——monoxide (CO) exceeding 2000 ppm measured on a dry basis, averaged over a minimum ——of 15 consecutive minutes.
 - (a) The provisions of this condition shall not apply to emissions from internal combustion engines.
 - [Rule 407 *Liquid and Gaseous Air Contaminants*; Version in SIP <u>Approved 9/08/78 = </u> = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(C), -09/08/78-43 FR 40011; <u>Approved 6/14/78 = 43 CFR 25684, 40 CFR 52.220(c)(32(iv)(A);</u> Current Rule Version = 07/25/77]
- 21. Owner/Operator shall not build, erect, install, or use any equipment at this facility, the use of which, without resulting in a reduction in the total release of air contaminants to the —atmosphere, reduces or conceals an emission that would otherwise constitute a violation —of Chapter 3 (commencing with Section 41700) of Part 4, of Division 26 of the Health and Safety Code or of District Rules.
 - __(a) ____This condition shall not apply to cases in which the —only violation involved is of ____Section 41700 of the Health and Safety Code, or of District —Rule 402.

 [Rule 408 *Circumvention*; Version in SIP <u>Approved 9/08/78</u> = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii),)—09/08/78-43 FR 40011, <u>Approved 6/14/78- 43 FR 25684, 40 CFR 52.220(c)(32(iv)(A)</u>; Current Rule Version = 07/25/77]
- Owner/Operator shall not discharge into the atmosphere from this facility from the burning of fuel, combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions averaged over a minimum of 25 consecutive minutes.
 [Rule 409 Combustion Contaminants; Version in SIP Approved 9/8/78 = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(C)₂—09/08/78- 43 FR 40011, Approved 6/14/78-43 FR 25684, 40 CFR 52.220(c)(32(iv)(A); Current Rule Version = 07/25/77]
 Reference Section III A(1)
- 23. APCO, at his/her discretion, may refrain from enforcement action against an Owner/Operator of any equipment that has violated a technology-based emission

limitation, including but not limited to conditions contained in any permit issued by the District establishing such emission limitation, provided that a Breakdown has occurred and:

- (a) Any breakdown that results in emissions exceeding a technology-based emission limitation is reported to the District within one hour of such breakdown or within one hour of the time a person knew or reasonably should have known the base air program manager is made aware of the occurrence of such breakdown.
- (b) An estimate of the repair time is provided to the District as soon as possible after the report of the breakdown.
- (c) All reasonable steps are immediately taken to minimize the levels of emissions and to correct the condition leading to the excess emissions.
- (d) The equipment is operated only until the end of a cycle or twenty-four (24) hours, whichever is sooner, at which time it shall be shut down for repairs unless a petition for an emergency variance has been filed with the clerk of the Hearing Board in accordance with Regulation V.
- (e) If the breakdown occurs outside normal District working hours, the intent to file an emergency variance shall be transmitted to the District in a form and manner prescribed by the APCO.

[SIP Pending: Rule 430 - *Breakdown Provisions* as amended 12/21/94 and submitted 02/24/95]

- 24. The provisions of Regulation IV, except Rule 402, shall not apply to experimental research operations when the following requirements are met:
 - (a) The purpose of the operation is to permit investigation, experiment, or research to advance the state of knowledge or the state of the art; and
 - (b) The APCO has given written prior approval that shall include limitation of time. [SIP: Not SIP: Rule 441 *Research Operations* Disapproved 1/16/81 and 40 CFR 52.272(a)(9)(i), 46 FR 3883, 40 CFR 52.272(a)(8)(i); Current Rule Version 7/25/77]
- 25. Owner/Operator of this facility shall not discharge into the atmosphere from equipment in which organic solvents or materials containing organic solvents are used unless such emissions have been reduced by at least 85% or to the following:
 - (a) VOCS from all VOC-containing material in excess of 540 kilograms (1,190 pounds) per month per facility.
 - (a) Organic materials that come into contact with flame or are baked, heat cured, or heat polymerized are limited to 1.4 kilograms (3.1 pounds) per hour not to exceed 6.5 kilograms (14.3 pounds) per day.
 - (b) Organic materials emitted into the atmosphere from the use of photo chemically reactive solvents are limited to 3.6 kilograms (7.9 pounds) per hour, not to exceed 18 kilograms (39.6 pounds) per day, except as provided in Rule 442, subsection (a)(1). All organic materials emitted for a drying period of 12 hours following their

application shall be included in this limit.

- (eb) Organic materials solvents emitted into the atmosphere from the use of non-photo-chemically reactive VOC solvents are limited to 36.8 kilograms (81 pounds) per hour-not to exceed 272 kilograms (600 pounds) per day. All organic materials emitted for a drying period of 12 hours following their application shall be included in this limit.
- (dc) The provisions of this condition shall not apply to the manufacture of organic solvents, or the transport or storage of organic solvents, or the transport or storage of materials containing organic solvents.
- (ed) The provisions of this rule shall not apply to:
 - The manufacture of organic solvents, or the transport or storage of organic solvents, or the transport or storage of materials containing organic solvents.
 - (2) The use of equipment for which other requirements are specified by Rules 461, 462, 463, and 464 other Regulation IV rules or which are exempt from air pollution control requirements by said rules.
 - (3) The spraying or other employment of organic solvents as insecticides, pesticides rodenticides, or herbicides.
 - (4) The use of water reducible materials, provided that:
 - (a) the volatile content of such material is not photo-chemically reactive and consists of at least 80 percent water by volume, and
 - (b) the organic solvent or any material containing organic solvent does not come into contact with flame.
- (5) The use of high solid materials, provided that:
 - (a) the volatile content of such material is not photochemically reactive and does not exceed 20 percent by volume of said material, and
 - (b) more than 50 percent by volume of such volatile material is evaporated before entering a chamber heated above ambient application temperature, and
 - (c) the organic solvent or any material containing organic solvent does not come into contact with flame.
 - (6) The use of ultra high solid materials, provided that:
 - (a) the volatile content of such material is not photo-chemically reactive and does not exceed 5 percent by volume of said material, and
 - (b) the organic solvent or any material containing organic solvent does not come into contact with flame.
- (7) The use of equipment or materials for which other requirements are specified in source specific rules of Regulation XI after the compliance dates specified in such source specific rules.

- (84) The use of 1-1-1 <u>t-T</u>richloroethane, <u>methylene chloride</u>, and <u>trichlorotrifluoroethane</u>.
- (5) Aerosol products.

[SIP: Rule 442 – *Usage of Solvents*, Approved 6/9/82,—47 FR 25013, 40 CFR 52.220(c)(51)(xii)(B); Approved 9/8/78,—43 FR 40011, 40 CFR 52.220(c)(39)(ii)(C); Current Rule Version 2/27/06, SIP Approved September 2007]

- 26. Owner/Operator shall not set open outdoor fires unless in compliance with Rule 444. Outdoor fires burned according to an existing District permit are not considered "open outdoor fires" for the purposes of Rule 444 ([reference Rule 444(B)(10)+]. [Rule 444 Open Outdoor Fires, Version in SIP submitted as amended 11/25/96 on 3/3/97 = Current, 43 FR 59488, 40 CFR 2.220(c)(42)(xiii)(A) and 40 CFR 52.273 (6)(12)(i)]
- 27. Owner/Operator of this facility shall comply with the Organic Solvent Degreasing Operations requirements of Rule 1104 when engaged in wipe cleaning, cold solvent cleaning, and/or vapor cleaning (degreasing) operations for metal/non-metal parts/products. These requirements are listed as follows:
 - (a) All degreasers shall be equipped with a cover, which reduces solvent evaporation and minimizes disturbing the vapor zone.
 - (b) A permanent, conspicuous label summarizing the applicable operating requirements contained in Rule 1104. In lieu of a label, operating instructions may be posted near the degreaser where the operators can access the proper operating requirements of this rule.
 - (c) Cold Solvent Degreasers Freeboard Requirements:
 - Cold solvent degreasers using only low volatility solvents, which are not agitated, shall operate with a freeboard height of not less than 6 inches.
 - (ii) Cold solvent degreasers using only low volatility solvents may operate with a freeboard ratio equal to or greater than 0.50 when the cold solvent degreaser has a cover, which remains closed during the cleaning operation.
 - (iii) Any cold solvent degreasers using solvent which is agitated, or heated above 50°C (120°F) shall operate with a freeboard ratio equal to or greater than 0.75.
 - (iv) A water cover may be used as an acceptable control method to meet the freeboard requirements, when the solvent is insoluble in water and has a specific gravity greater than one.
 - (d) <u>Cold Solvent Degreasers Cover Requirements:</u>
 - (i) Cold solvent degreasers using high volatility solvent shall have a cover that is a sliding, rolling or guillotine (bi-parting) type, which is designed to easily open and close without disturbing the vapor zone.

- (e) <u>Cold Solvent Degreasers Solvent Level Identification:</u>
 - (i) A permanent, conspicuous mark locating the maximum allowable solvent level conforming to the applicable freeboard requirements.
- (f) All Degreasers shall comply with the following operating requirements:
 - Any solvent cleaning equipment and any emission control device shall be operated and maintained in strict accord with the recommendations of the manufacturer.
 - (ii) Degreasers shall not be operating with any detectable solvent leaks. All solvent, including waste solvent and waste solvent residues, shall be stored in closed containers at all times. All containers for any solvent(s) shall have a label indicating the name of the solvent/material they contain.
 - (iv) Waste solvent and any residues shall be disposed of by one of the following methods: a commercial waste solvent reclamation service licensed by the State of California; or a federally or state licensed facility to treat, store or dispose of such waste; or the originating facility may recycle the waste solvent and materials in conformance with requirements of Section 25143.2 of the California Health and Safety Code.
 - Degreasers shall be covered to prevent fugitive leaks of vapors, except when processing work or to perform maintenance.
 - (vi) Solvent carry-out shall be minimized by the following methods:
 - (a) Rack workload arranged to promote complete drainage
 - (b) Limit the vertical speed of the power hoist to 3.3 meters per minute (11 ft/min) or less when such a hoist is used.
 - (c) Retain the workload inside of the vapor zone until condensation ceases.
 - (d) Tip out any pools of solvent remaining on the cleaned parts before removing them from the degreaser if the degreasers are operated manually.
 - (e) Do not remove parts from the degreaser until the parts are visually dry and not dripping/leaking solvent. (This does not apply to an emulsion cleaner workload that is rinsed with water within the degreaser immediately after cleaning.)
 - (vii) The cleaning of porous or absorbent materials such as cloth, leather, wood or rope is prohibited.
 - (viii) Except for sealed chamber degreasers, all solvent agitation shall be by either pump recirculation, a mixer, or ultrasonics.
 - (ix) The solvent spray system shall be used in a manner such that liquid solvent does not splash outside of the container. The solvent spray shall be a continuous stream, not atomized or shower type, <u>unless</u>, the spray is conducted in a totally enclosed space, separated from the environment.
 - (x) For those degreasers equipped with a water separator, no solvent shall be

- visually detectable in the water in the separator.
- (xi) Wipe cleaning materials containing solvent shall be kept in closed containers at all times, except during use.
- (xii) A degreaser shall be located so as to minimize drafts being directed across the cleaning equipment, the exposed solvent surface, or the top surface of the vapor blanket.
- (xiii) A method for draining cleaned material, such as a drying rack suspended above the solvent and within the freeboard area, shall be used so that the drained solvent is returned to the degreaser or container.
- (g) <u>Rule 442 Applicability:</u> Any solvent using operation or facility which is <u>not</u> subject to the source-specific Rule 1104 shall comply with the provisions of Rule 442. Any solvent using operation or facility which is exempt from all or a portion of the volatile organic compound (VOC) limits, equipment limits or the operational limits of Rule 1104 shall be subject to the applicable provisions of Rule 442.
- (h) <u>Solvent Usage Records.</u> Owner/Operator subject to Rule 1104 or claiming any exemption under Rule 1104, Section (E), shall comply with the following requirements:
 - (1) Maintain and have available during an inspection, a current list of solvents in use at the facility which provides all of the data necessary to evaluate compliance, including the following information separately for each degreaser, as applicable:
 - (i) product name(s) used in the degreaser, and
 - (ii) the mix ratio of solvent compounds mixtures of solvents are used,
 - (iii) VOC content of solvent or mixture of compounds as used, and
 - (iv) the total volume of the solvent(s) used for the facility, on a monthly basis, and
 - (v) the name and total volume applied of wipe cleaning solvent(s) used, on a monthly basis.
 - (2) Additionally, for any degreaser utilizing an add-on emission control device/system as a means of complying with provisions of Rule 1104 shall, on a monthly basis, maintain records of key system operating and maintenance data. Such data are recorded for the purpose of demonstrating continuous compliance during periods of emission producing activities. The data shall be recorded in a manner as prescribed by the District.
 - 4-(3) Documentation shall be maintained on site of the disposal, or on-site recycling, of any waste solvent or residues.
 - 2-(4) Records shall be retained (at facility) and available for inspection by District, state or federal personnel for the previous 5-year period as required by this Title V / Federal Operating Permit (Reference Rule 1203(D)(1)(d)(ii)).

[Rule 1104 - Organic Solvent Degreasing Operations; Version in SIP-Approved 4/30/96=

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Current, 40 CFR 52.220(c)(207)(i)(D)(2) - 04/30/96 _. 61 FR 18962; Current Rule Version, effective 11/30 9/28/94]

28. Owner/Operator's use of *Architectural Coatings* at this facility shall comply with the applicable requirements of Rule 1113, including the VOC limits specified in Rule 1113, part C, Table of Standards, as listed below:

Table of Standards	
<u>COATING:</u>	VOC (grams/liter
	[g/L])
Antenna Coatings	530
Bituminous Roof Coatings	300
Bituminous Roof Primers	350
Below Ground Wood Preservatives	-600
Bond Breakers	-350
Clear Wood Coatings	
Clear Brushing Lacquers	680
Lacquers (including lacquer sanding sealers)	550
Sanding sealers (other than lacquer sanding sealers)	350
Varnishes	350
Concrete Curing Compounds	-350
Dry-Fog Coatings	-400
Fire Resistive Coatings	350
Fire Retardant Coatings	
Clear	-650
Pigmented Opaque	350
Flat Coatings	-250 100
Floor Coatings	250
Flow Coatings	420
Form-Release Compounds	250
General Primers, Sealers and Undercoaters	350
Graphic Arts (Sign) Coatings	-500
High Temperature Coatings	550 420
Industrial Maintenance Coatings	<u>250</u>
Anti-Graffiti Coatings	600
General Coatings	420
Lacquer	680
Magnesite Cement Coatings	600 450
Mastic Texture Coatings	-300
Metallic-Pigmented Coatings	-500
Multi-Color Coatings	-580 250
Nonflat Coatings	150

Nonflat-High Gloss Coatings	250
Opaque Stains	350
Opaque Wood Preservatives	350
Pretreatment (Wash) Primer	-780 420
Quick Dry Enamels	-400 250
Quick Dry Primers, Sealers and Undercoaters	-450 200
Recycled Coatings	250
Roof Coatings	-300 250
Rust Preventative Coatings	400
Sanding Sealers	550
Semi-transparent Stains	350
Semi-transparent and Clear Wood Preservatives	350
Shellac	
Clear	-730
Pigmented Opaque	550
Specialty Primers, Sealers, and Undercoaters	350
Swimming Pool Coatings	-650 340
Swimming Pool Repair and Maintenance Coatings	-650 340
Temperature-Indicator Safety Coatings	550
Traffic Marking Coatings	250 150
Varnish	350
	-400 250
Waterproofing Concrete/Masonry Sealers	400
Wood Preservatives	350
[Rule 1113 - Architectural Coatings; Version in SIP—02/20/79 S	Submitted as amende
2/24/03; Submitted as amended 11/2/92 on 1/11/93, Approved 6/	
52.220(c)(51)(xii)(B)-06/09/82, 47 FR 25013; Current Rule Vers	

52.220(c)(51)(xii)(B)-06/09/82, 47 FR 25013; Current Rule Version = 0902/0224/9203]
29. Owner/Operator's use of *Wood Products Coatings* at this facility shall comply with the

29. Owner/Operator's use of *Wood Products Coatings* at this facility shall comply with the applicable requirements of Rule 1114, including the VOC limits specified in Rule 1114, part C, Table of Standards, as listed below:

(1) <u>VOC Content of Coatings & Adhesives</u>

(a) Any Owners and/or Operators of Wood Products Coating Application Operations shall not apply any Coating or Adhesive to a Wood Product which has a VOC Content, including any VOC-containing material added to the original Coating supplied by the manufacturer, which exceeds the applicable limit specified below, unless emissions to the atmosphere are controlled by air pollution abatement equipment with an Overall Control Efficiency of at least 85 percent. Any Coating subject to this rule that meets either of the two VOC Content limit formats (grams per liter or

pounds per gallon [lb/gal]) is in compliance with this subsection.

(i) LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

		On and 7/1/	On and After 7/1/2005	
Coating	Current Limit g/L (lb/gal)	Column I or g/L (lb/gal)	Column II g/L (lb/gal)	g/L (lb/gal)
Clear Sealers	680 (5.7)	550 (4.6)	680 (5.7)	275 (2.3)
Clear Topcoat	680 (5.7)	550 (4.6)	275 (2.3)	275 (2.3)
Pigmented Primers, Sealers and Undercoats	600 (5.0)	550 (4.6)	600 (5.0)	275 (2.3)
Pigmented Topcoats	600 (5.0)	550 (4.6)	275 (2.3)	275 (2.3)

Effective July 1, 1997, a person or facility shall use Coatings on Wood Products that comply with either all VOC Content limits in Column I or all VOC Content limits in Column II. A person or facility that applies a Pigmented Primer, Sealer, or Undercoat, but not a Clear Topcoat or Pigmented Topcoat, to a Wood Product shall be subject to column I for that product.

(ii) Notwithstanding the requirements of subsection (C)(1)(a)(i), a person or facility that applies a topcoat and a primer, sealer or undercoat to a Shutter may, until July 1, 2005, choose to comply with the VOC Content limits specified below for that Shutter:

(c) LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

Coating	g/L (lb/gal)
Clear Sealers	275 (2.3)
Clear Topcoat	680 (5.7)
Pigmented Primers, Sealers & Undercoats	275 (2.3)
Pigmented Topcoats	600 (5.0)

(d) LIMITS
Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds (VOC Content)

		On and After 7/1/97	On and After 7/1/2005
Coating	Current Limit g/L (lb/gal)	g/L (lb/gal)	g/L (lb/gal)
Fillers	500 (4.2)	500 (4.2)	275 (2.3)
High-Solid Stains	700 (5.8)	550 (4.6)	350 (2.9)
Inks	500 (4.2)	500 (4.2)	500 (4.2)
Mold-Seal Coatings	750 (6.3)	750 (6.3)	750 (6.3)
Multi-Colored Coatings	685 (5.7)	685 (5.7)	275 (2.3)
Low-Solids Stains, Toners and Washcoats	800 (6.7)	480 (4.0)	120 (1.0)
Adhesives	250 (2.1)	250 (2.1)	250 (2.1)

[Rule 1114 - *Wood Products Coating Operations*; Version in SIP = Current, Approved: 08/18/98,–63 FR 44132, 40 CFR 52.220(c)(244)(i)(C); Approved 61 FR 18962, 04/30/96; Current Rule Version 11/25/96]

30. Owner/Operator's use of *Metal Parts and Products Coatings* at this facility shall comply with the applicable requirements of Rule 1115, including the VOC limits specified in Rule 1115, as listed below:

Owner/Operator shall not apply to metal parts and products any coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contain VOC in excess of the limits specified below <u>unless</u> emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with a capture and control system Combined Efficiency of at least 85 percent:

<u>LIMITS</u>
(Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds)

Coating	Air Dried		_Bak	Baked	
Č	g/L	(lb/gal)	g/L	(lb/gal)	
General	420	(3.5)	360	(3.0)	
Military Specification	420	(3.5)	360	(3.0)	
Etching Filler	420	(3.5)	420	(3.5)	

II - 14 Enclosure 2

		(2.5)	• • •	(2.0)
Solar-Absorbent	420	(3.5)	360	(3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
High-Gloss	420	(3.5)	360	(3.0)
Extreme High-Gloss	420	(3.5)	360	(3.0)
Metallic	420	(3.5)	420	(3.5)
Extreme Performance	420	(3.5)	360	(3.0)
Prefabricated Architectural				
Component	420	(3.5)	275	(2.3)
Touch Up	420	(3.5)	360	(3.0)
Repair	420	(3.5)	360	(3.0)
Silicone-Release	420	(3.5)	420	(3.5)
High Performance				
Architectural	420	(3.5)	420	(3.5)
Camouflage	420	(3.5)	420	(3.5)
Vacuum-Metalizing	420	(3.5)	420	(3.5)
Mold-Seal	420	(3.5)	420	(3.5)
High-Temperature	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
Pan-Backing	420	(3.5)	420	(3.5)
Pretreatment Wash Primer	420	(3.5)	420	(3.5)
Clear Coating	520	(4.3)	520	(4.3)

[Rule 1115 - Metal Parts and Products Coating Operations; Version in SIP—Current, Approved - 12/23/97 = 40 CFR 52.220(c)(239)(i)(A)(2) -12/23/97-62 FR 67002, effective 2/23/98; Current Rule Version 4/22/96]

31. Owner/Operator's use of *Automotive Finishing Operations* at this facility shall comply with the applicable requirements of Rule 1116, including the VOC limits specified in Rule 1116, as listed below:

Any person who applies Coatings to Group I Vehicles (Buses and Mobile Equipment), Group II Vehicles (Passenger cars, Large/Heavy Duty Truck cabs and chassis, Light and Medium Duty Trucks and Vans, and motorcycles), or their parts and components, shall comply with subsections (a) or (b) below:

(a) Group I Vehicles and Mobile Equipment

Any person shall not finish or refinish Group I Vehicles and Mobile Equipment or their parts and components where Color Match is not required, using any Coating with a VOC content in excess of the following limits, expressed as Grams of VOC per Liter of Coating, Less Water and Less Exempt Compounds, as applied, unless emissions of VOC to the atmosphere are controlled by air pollution abatement equipment with combined capture efficiency and control efficiency of the abatement device of at least 85 percent, and which has been approved in writing by the APCO:

	VOC Limits
Pretreatment Wash Primer	780 g/L (6.5 lb/gal)
Primer	250 g/L (2.1 lb/gal)
Primer Sealer	250 g/L (2.1 lb/gal)
Topcoat	340 g/L (2.8 lb/gal)
Metallic Topcoat	420 g/L (3.5 lb/gal)
Extreme Performance	420 g/L (3.5 lb/gal)

(b) Any person shall not refinish Group II Vehicles (Passenger cars, Large/Heavy Duty truck cabs and chassis, Light and Medium Duty trucks and vans, and motorcycles), their parts and components, or Group I Vehicles and Mobile Equipment where Color Match is required, using any Coating with a VOC content in excess of the following limits, expressed as Grams of VOC per Liter of Coating, Less Water and Less Exempt Compounds, as applied, unless emissions of VOC to the atmosphere are controlled by air pollution abatement equipment with a combined capture efficiency and control efficiency of the abatement device of at least 85 percent, and which has been approved in writing by the APCO:

	VOC Limits
Pretreatment Wash Primer	780 g/L (6.5 lb/gal)
Primer/Primer Surfacer	250 g/L (2.1 lb/gal)
Primer Sealer	340 g/L (2.8 lb/gal)
Topcoat	420 g/L (3.5 lb/gal)
Metallic Topcoat	420 g/L (3.5 lb/gal)
Multi-Stage Topcoat System	420 g/L (3.5 lb/gal)

[Rule 1116 - Automotive Finishing Operations; [SIP: Approved: 4/10/00 - 65 FR 18901, 40 CFR 52.220(c)(268)(i)(8)(B)(1); Approved 6/13/95 - 60 FR 31081, 40 CFR 52.220(c)(216)(i)(A)(1); Approved: 12/20/93 - 58 FR 662833, 40 CFR 52.220(c)(188)(I)(B)(1); Current Rule Version 4/26/99]

32. Owner/Operator's use of *Aerospace Vehicle Parts and Products Coating Operations* at this facility shall comply with the applicable requirements of Rule 1118, including the VOC limits specified in Rule 1118, as listed below:

Any person who manufactures or reworks aerospace vehicles by applying or specifying the use of surface coatings for aerospace vehicle parts and products shall comply with the following requirements:

A person shall not apply any coating or specify the use of any coating, which, as applied, emits or may emit volatile organic compounds into the atmosphere in excess of the limits shown in the table below. These limits are expressed in Grams of VOC per Liter of Coating Less Water and Exempt Compounds (VOC content):

Coating Type	VOC Limit	
	g/L	<u>lb/gal</u>
Adhesive		
- Bonding Primer	250	2.1
- Non-structural adhesive	250	2.1
- Structural adhesive, autoclavable	50	0.4
- Structural adhesive, non-autoclavable	700	5.9

Coating Type	VOC Limit		
	g/L	<u>lb/gal</u>	
CARC	500	4.2	
Electric/Radiation Effect	800	6.7	
Extreme Performance			
- Coating	420	3.5	
- Interior Topcoat	420	3.5	
Fire-Resistant Coating			
- Civilian	650	5.4	
- Military	970	7.7	
Fuel Tank Coating	720	6.0	
General Coating Product	350	2.9	
High Temperature Coating	720	6.0	
Interior Topcoat	340	2.8	
Maskant for			
- Chemical Processing	600	5.0	
- Chemical Milling, Type I Etchant	622	5.2	
- Chemical Milling, Type II Etchant	160	1.3	
Pretreatment Wash Primer	780	6.6	
Primer	350	2.9	
Rain Erosion Resistant Coating	600	5.0	
Sealant	600	5.0	
Sealant Bonding Primer	720	6.0	
Self Priming Topcoat	420	3.5	
Space Vehicle Coating			
- Electrostatic-Discharge	800	6.7	
- Other	1000	8.3	
Temporary Protective Coating	250	2.1	
Topcoat	420	3.5	
Unicoat	420	3.5	
Wing Coating	750	6.3	

[Rule 1118 - *Aerospace Vehicle Parts and Products Coating Operations;* Version in SIP = Current: Approved: 8/17/98,__63 FR 43884, 40 CFR 52.220(c)(242)(I)(A)(1): Current Rule Version 10/28/96]

33. If in the future the facility performs operations subject to the National Emissions Standard for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities, those operations must comply with the requirements of that regulation. This Title V Permit and applicable District Permits would require modification to allow Aerospace Manufacturing and Rework Facilities within the Mojave Desert Air Quality Management District jurisdiction.

[40 CFR 63 Subpart GG]

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) and 40 CFR 52.220(c)31(vi)(C) Approved - 11/09/78, 43 FR 52237; Current Rule Version = 07/25/77]
[MDAQMD Rule 1203]

B. <u>FACILITY-WIDE MONITORING, RECORDKEEPING, AND REPORTING</u> REQUIREMENTS:

- Any data and records generated and/or kept pursuant to the requirements in this Federal
 Operating Permit (Title V Permit) shall be kept current and on site for a minimum of five
 (5) years from the date generated. Any records, data, or logs shall be supplied to District,
 state, or federal personnel upon request.
 [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)].
- 2. Any Compliance/Performance testing required by this Federal Operating Permit shall follow the administrative procedures contained in the District's <u>Compliance Test Procedural Manual</u>. Any required annual Compliance and/or Performance Testing shall be accomplished by obtaining advance written approval from the District pursuant to the District's <u>Compliance Test Procedural Manual</u>. All emission determinations shall be made as stipulated in the <u>Written Test Protocol</u> accepted by the District. When proposed testing involves the same procedures followed in prior District approved testing, then the previously approved <u>Written Test Protocol</u> may be used with District concurrence. [Rule 204 <u>Permit Conditions</u>; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) 11/09/78 43 FR 52237; Current Rule Version = 07/25/77]
- 3. The owner/operator of permit units subject to Comprehensive Emissions Inventory Report / Annual Emissions Determinations for District, state, and federal required Emission Inventories shall monitor and record the following for each unit:
 - a) The cumulative annual usage of each fuel type. The cumulative annual usage of each fuel type shall be monitored from utility service meters, purchase, or tank fill records
 - (b) Fuel suppliers' fuel analysis certification/guarantee including fuel sulfur content shall be kept on site and available for inspection by District, state or federal

personnel upon request. The sulfur content of diesel fuel shall be determined by use of ASTM method D2622-82, or (ASTM method D 2880-71, or equivalent). Vendor data meeting this requirement are sufficient.

[40 CFR 70.6(a)(3)(B) – Periodic Monitoring Requirements]
[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 _ 43 FR 52237; Current Rule Version = 07/25/77]
[Federal Clean Air Act: §110(a)(2)(F, K & J); §112; §172(c)(3); §182(a)(3)(A & B); §187(a)(5); § 301(a)] and in California Clean Air Act, Health and Safety Code §§39607 and §§44300 et seq.]

- 4. (a) Owner/Operator shall submit Compliance Certifications as prescribed by Rule 1203(F)(1) and Rule 1208, in a format approved by MDAQMD. Compliance Certifications by a Responsible Official shall certify the truth, accuracy, and completeness of the document submitted and contain a statement to the effect that the certification is based upon information and belief, formed after a reasonable inquiry; the statements and information in the document are true, accurate, and complete.
 [40 CFR 70.6(c)(5)(i); Rule 1208; Rule 1203(D)(1)(vii through x)]
 - (b) Owner/Operator shall include in any Compliance Certification the methods used for monitoring such compliance.

 [40 CFR 70.6(c)(5)(ii); Rule 1203(D)(1)(g)(viii)]
 - Owner/Operator shall comply with any additional certification requirements as specified in 42 United States Code (U.S.C.) §7414(a)(3), Recordkeeping, Inspections, Monitoring and Entry (Federal Clean Air Act §114(a)(3)) and 42 U.S.C. §7661c(b), Permit Requirements and Conditions (Federal Clean Air Act §503(b)), or in regulations promulgated thereunder. [Rule 1203 (D)(1)(g)(x)]
 - (d) On an <u>annual</u> basis, of any given year, owner/operator shall submit a <u>Compliance Certification Report</u>, within 90 days of the anniversary of the date of the issuance or renewal of the Federal Operating Permit, to the APCO/District pursuant to District Rule 1203. Each report shall be certified to be true, accurate, and complete by "The Responsible Official" and a copy of this annual report shall also be contemporaneously submitted to the EPA Region IX Administrator. [40 CFR 72.90.a <u>and</u> Rule 1203 (D)(1)(g)(v x)]
- Owner/Operator shall submit, on an annual basis, a *Monitoring Report* to the APCO/District. Each *Monitoring Report* shall be submitted no later than 90 days after the midpoint (six months after the Title V Permit month & day issue date) of the Title V Permit anniversary date of any given year. This *Monitoring Report* shall be certified to be true, accurate, and complete by "The Responsible Official" and shall include the following information and/or data:

- (a) Summary of deviations from any federally-enforceable requirement in this permit.
- (b) Summary of all emissions monitoring and analysis methods required by any Applicable Requirement / federally enforceable requirement.
- (c) Summary of all periodic monitoring, testing or record keeping (including test methods sufficient to yield reliable data) to determine compliance with any Applicable Requirement / federally enforceable requirement that does not directly require such monitoring.

An alternate Monitoring Report format may be used upon prior approval by MDAQMD. [Rule 1203(D)(1)(e)(i)]

6. Owner/Operator shall promptly report all deviations from Federal Operating Permit requirements including, but not limited to, any emissions in excess of permit conditions, deviations attributable to breakdown conditions, and any other deviations from permit conditions. Such reports shall include the probable cause of the deviation and any corrective action or preventative measures taken as a result of the deviation. [Rule 1203(D)(1)(e)(ii) and Rule 430(C)]

Prompt reporting shall be determined as follows:

- (a) For deviations involving emissions of air contaminants in excess of permit conditions including but not limited to those caused by a breakdown, prompt reporting shall be within one hour of the occurrence of the excess emission or within one hour of the time a person the base air program manager knew is made aware of or reasonably should have known of the excess emission. Documentation and other relevant evidence regarding the excess emission shall be submitted to the District within sixty (60) days of the date the excess emission was reported to the District. [SIP Pending: Rule 430 Breakdown Provisions as amended on 12/21/94 and submitted on 2/24/95]
- (b) For other deviations from permit conditions not involving excess emissions of air contaminants shall be submitted to the District with any required monitoring reports at least every six (6) months. [Rule 1203(D)(1)(e)(i)]
- 7. If any facility unit(s) should be determined not to be in compliance with any federally-enforceable requirement during the 5-year permit term, then owner/operator shall obtain a *Schedule of Compliance* approved by the District Hearing Board pursuant to the requirements of MDAQMD Regulation 5 (Rules 501 518). In addition, owner/operator shall submit a *Progress Report* on the implementation of the *Schedule of Compliance*. The *Schedule of Compliance* shall contain the information outlined in (b), below. The *Progress Report* shall contain the information outlined in (c), below. The *Schedule of Compliance* shall become a part of this Federal Operating Permit by administrative incorporation. The *Progress Report* and *Schedule of Compliance* shall comply with Rule 1201(I)(3)(iii) and shall include:
 - (a) A narrative description of how the facility will achieve compliance with such

requirements; and

- (b) A Schedule of Compliance which contains a list of remedial measures to be taken for the facility to come into compliance with such requirements, an enforceable sequence of actions, with milestones, leading to compliance with such requirements and provisions for the submission of Progress Reports at least every six (6) months. The Schedule of Compliance shall include any judicial order, administrative order, and/or increments of progress or any other schedule as issued by any appropriate judicial or administrative body or by the District Hearing Board pursuant to the provisions of Health & Safety Code §42350 et seq.; and
- (c) Progress Reports submitted under the provisions of a Schedule of Compliance shall include: Dates for achieving the activities, milestone, or compliance required in the schedule of compliance; and dates when such activities, milestones or compliance were achieved; and an explanation of why any dates in the schedule of compliance were not or will not be met; and any preventive or corrective measures adopted due to the failure to meet dates in the schedule of compliance. [Rule 1201 (I)(3)(iii); Rule 1203 (D)(1)(e)(ii); Rule 1203 (D)(1)(g)(v)]

8. MCLB Barstow Yermo Annex Title V Permit Hazardous Air Pollutant Limits

(a). General Limit for Entire Facility

The total emissions of Hazardous Air Pollutants (HAPs) for the *Marine Corps Logistics Base Barstow –Yermo Annex* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs calculated monthly on a rolling annual basis. HAPs are defined in 40 CFR 61.01 "Lists of pollutants" and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

(b). <u>Monitoring, Periodic Monitoring & Recordkeeping Conditions</u>

To prove compliance with condition (a) above, permittee shall maintain daily usage records of all HAP-containing coating and solvent materials. Such records shall be compiled into a monthly usage report, which shall be added to the 12 immediately previous monthly usage reports. HAP emissions from coatings and solvent operations shall be calculated on a monthly basis and added to the annualized HAP emissions from *fuel burning and other HAP emitting equipment*.

Annualized HAP emissions from *fuel burning and other HAP emitting equipment* for purposes of this condition shall be determined by use of HAP emissions factors (as set forth by District approved *emission factors*), or by annualized actual HAP emissions as determined by source test of the equipment, or by methods and emission factors established in an approved comprehensive

Comprehensive Emission Inventory Plan (CEIP).

[40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements]
[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 43 FR 52237; Current Rule Version = 07/25/77]
[California Clean Air Act, Health and Safety Code §§39607 and §§44300 et seq., and the Federal Clean Air Act, §110(a)(2)(F)(ii), codified in 40 CFR 60 Subpart Q]

C. FACILITY-WIDE COMPLIANCE CONDITIONS:

- owner/operator shall allow an authorized representative of the MDAQMD to enter upon the permit holder's premises at reasonable times, with or without notice.
 [40 CFR 70.6(c)(2)(i); Rule 1203(D)(1)(g)(i)]
- Owner/Operator shall allow an authorized representative of the MDAQMD to have access to and copy any records that must be kept under condition(s) of this Federal Operating Permit.
 [40 CFR 70.6(c)(2)(ii); Rule 1203(D)(1)(g)(ii)]
- Owner/Operator shall allow an authorized representative of the MDAQMD to inspect any equipment, practice or operation contained in or required under this Federal Operating Permit.
 [40 CFR 70.6(c)(2)(iii); Rule 1203(D)(1)(g)(iii)]
- 4. Owner/Operator shall allow an authorized representative of the MDAQMD to sample and/or otherwise monitor substances or parameters for the purpose of assuring compliance with this Federal Operating Permit or with any Applicable Requirement. [40 CFR 70.6(c)(2)(iv); Rule 1203(D)(1)(g)(iv)]
- Owner/Operator shall remain in compliance with all Applicable Requirements / federally enforceable requirements by complying with all compliance, monitoring, record-keeping, reporting, testing, and other operational conditions contained in this Federal Operating Permit. Any noncompliance constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; the termination, revocation and re-issuance, or modification of this Federal Operating Permit; and/or grounds for denial of a renewal application.
 [1203 (D)(1)(f)(ii)]
- 6. Owner/Operator shall comply in a timely manner with all applicable requirements / federally enforceable requirements that become effective during the term of this permit.

[Rule 1201 (I)(2); Rule 1203(D)(1)(g)(v)]

- 7. Owner/Operator shall insure that all applicable subject processes comply with the provisions of 40 CFR 61, *National Emission Standards for Hazardous Air Pollutants*, subpart A, *General Provisions*, and subpart M, *Asbestos*.

 [40 CFR 61, subparts A and M]
- 8. Owner/Operator shall notify APCO/District at least 10 working days before any applicable asbestos stripping or removal work is to be performed as required by section 61.145.b of 40 CFR 61 subpart M, *National Emission Standard for Asbestos*. [40 CFR 61.145.b]
- Owner/Operator shall notify the APCO/District, on an annual basis, postmarked by December 17 of the calendar year, of the predicted asbestos renovations for the following year as required by section 61.145.b of 40 CFR 61, subpart M [see cite for threshold triggering and applicability].
 [40 CFR 61.145.b]

PART III

EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

Permit Conditions; (Unless Otherwise Stated All Following Conditions Result From Rule 204 – Permit Conditions; Version In SIP = CARB EX. ORDER G-73, 40 CFR 52.220(C)(39)(II)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77:

A. <u>ABRASIVE BLASTING EQUIPMENT</u>, described as follows:

ABRASIVE BLAST BOOTH, MDAQMD permit number A000951 (Bldg. 570),

Big Blast North Unit, consisting of:

Air Compressor, Abrasive Blast Supply

Abrasive Reclaim System, Floor Type (with nine three hp motors)

Elevator Assembly

Air Wash Abrasive Separator Motor Volume of blast section: 20,736 ft³

24' W x 32' L x 27' H

Control: Fabric Dust Collector C003245

ABRASIVE BLAST BOOTH, MDAQMD permit number A000952 (Bldg. 570),

Big Blast, South Unit, consisting of:

Air Compressor, Abrasive Blast Supply

Abrasive Reclaim System, Floor Type (with nine three hp motors)

Elevator Assembly

Air Wash Abrasive Separator Motor Volume of blast section: 20,736 ft³

24'W x 32'L x 27'H

Control: Fabric Dust Collector, C003247

ABRASIVE BLASTING SYSTEM, MDAQMD permit number A003915 (Bldg. 629) consisting of:

BUILDING 629; La Grange Products, Model 1427-308, 125 psi working pressure.

Dimensions: $10^{\circ}h \times 2.5^{\circ}l \times 2.5^{\circ}w (62.5 \text{ ft}^3)$.

ABRASIVE BLASTING SYSTEM, MDAQMD permit number A003959 (at Bldg. 569)

consisting of: North Hardstand; Plastic Media Blast Booth Stripping Technologies, Inc.

Dimensions: 30'w x 60'l x 19'h

2 deck, 40" diameter, vibrating classifier for blast media

Reclaimer Systems (grating floor utilizing 6 screws)

Abrasive storage Low profile loading hopper (100 cubic feet)

Pressure vessel, ASME coded, 11 cu. ft., with 60 degree cone bottom

Tunable cyclone-Air wash abrasive separator, powered by elevator motor,

Elevator Assembly, 2 hp motor,

2-50 ft., 1 1/4" hoses for blasting, 2 tungsten carbine 1/2" nozzles

Magnetic separator with electrical, piping, valving

ABRASIVE BLASTING CABINET, MDAQMD permit number A004412 (Bldg. 629)

consisting of:

BUILDING 629; by Sunspan Systems Inc. Cabinet dimensions are 9' Widew Xx 6' High Xx 12' Longl; includes: automated blast table 6' long, 25 hp centrifugal blast wheel, steel shot blasting media, with steel shot consumption rate of 125 lbs/hr. Device also has an integral 1.5 hp screw conveyer. Wheelabrator 94 cu ft. w/vacuum and baghouse (#72AS28).

ABRASIVE BLASTER, ROTARY, MDAQMD permit number A005014 (at Bldg. 629)

consisting of: BCP Double swing table blaster, Model CA4-5640, with integral cartridge dust collector.

ABRASIVE BLASTER ROTARY, MDAQMD permit number A005015 (at Bldg. 573)

consisting of: Goff table blaster, Model 72PTW/1016DC, with an integral dust collector, filter area Formatted: Indent: Left: 0", Hanging: 0.5", 540 sq. ft.

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ABRASIVE BLAST BOOTH, MDAQMD permit number A005113

(at Bldg. 566)

consisting of: Booth 28' x 30' x 56'.

This unit is equipped with a screener classifier for re-use of used blast materials. and

final filters to collect 100% of all particles greater than 1.0 micron.

This system vents through an air pollution control device operating under valid District

permit number C010410.

ABRASIVE BLAST BOOTH, MDAQMD permit number A008793 (at Buillding. 629)

consisting of: Blast room enclosure, 22'6" wide, 12' high, and 22'6#-"-long, including a reclaimer system (grating floor type with three screws), Elevator assembly, Air Wash abrasive separator, and abrasive storage hopper (50 eu-ft³). Booth Ventilation and Abrasive Reclaimer vent to a Fabric Dust Collector air pollution control device, District permit number C008808.

<u>Capacity</u>	Equipment Description
102 100	Abrasive Blast supply compressed air
12.0	Floor reclaim system (4), 3 <u>HPhp</u> motor
2.0	Elevator assembly
0.3	Air Wash abrasive separator Motor (powered by the
	elevator's motor)

SUPER BLAST BOOTH ONE (NORTH OF BLDG 573 BLDG 565), MDAQMD permit number A009130 (at Bldg. 565)

Consisting of: This abrasive blasting system is equipped with a floor grating reclaimer system, elevator assembly, air wash abrasive separator, and 50 eubic foot³ abrasive storage hopper, and measures 30' \(\frac{1}{2}\) \(\frac{1}{2}\)

Capacity	Equipment Description
40.0	Eight Under_floor Screw Motors (5 hp each)
2.0	Abrasive Bucket Elevator (2 hp)
150.0	Air Compressor (150 hp)

SUPER BLAST BOOTH TWO (NORTH OF BLDG 573 BLDG 565), MDAQMD permit number A009131 (at Bldg. 565)

Consisting of: This abrasive blasting system is equipped with a floor grating reclaimer system, elevator assembly, air wash abrasive separator and 50 eubic foot³ abrasive storage hopper, and measures 30' \(\frac{\text{Ww}}{\text{byx}}\) 25' \(\frac{\text{Hh}}{\text{byx}}\) 48' \(\frac{\text{Ll}}{\text{with}}\) inder_floor screws.

Capacity	Equipment Description
40.0	Eight Under_floor Screw Motors (5 hp each)
2.0	Abrasive Bucket Elevator (2 hp)
150.0	Air Compressor (150 hp)

Conditions for units with permit numbers: A000951, and A000952, A005113.

- 1. This abrasive blast booth shall not be operated unless it is vented to a functioning air pollution control device covered by a valid District permit, or which are an integral part of the equipment.
- 2. This abrasive blast booth must be equipped with tight fitting seals around all opening, such as doors, windows, seams, etc., so as to prevent the escape of particulate materials to the ambient air while in use.
- 3. An annual compliance/certification test of this unit for particulate and PM₁₀ is not

required. However, the owner/operator shall conduct such testing upon District request and shall be in accordance with the District's "Compliance Test Procedural Manual."

4. This abrasive blast booth shall only be operated and maintained in strict accord with manufacturer's and/or supplier's recommendations and/or sound engineering principles.

Conditions for units with permit numbers: A003915, A004412.

- Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit was issued unless otherwise noted below.
- 2. An operation log shall be maintained on-site for at least five (5) years and be made available to District, state, or federal personnel on request. This log shall contain, as a minimum, the type and the amount of blasting material used in this cabinet.
- This equipment shall only be operated/maintained in strict accord with manufacturer's/supplier's recommendations and sound engineering principles.

Conditions for units with permit numbers: A003959=

- 1. Abrasive blasting operations within any permanent building shall not discharge into the atmosphere emissions which have an opacity of 20% 10% or greater.
- 2. The owner/operator shall operate this equipment in strict accord with the manufacturer's specifications and/or sound engineering practices.
- 3. The owner/operator shall maintain a log of abrasive blast materials used in the cabinet. The log shall be maintained on-site for a minimum of 5 years and provided to District, state, or federal personnel on request.
- 4. The maximum PM that may be discharged into the atmosphere under this permit is 137 lb/day. The maximum PM₁₀ that may be emitted shall be 80 lb/day.
- 5. The unit shall not be operated unless vented to properly functioning control equipment under valid District permit number C003961.

Conditions for units with permit number: A004412

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- This equipment shall be installed, operated, and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants.
- Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit was issued unless otherwise noted below.
- 3. The abrasive blast enclosure (building) shall not be operated unless vented to properly functioning control device operating under \(\formall^{\text{Valid District Ppermit}}\) number C010219.
- 4. The abrasive blast enclosure (building) must be equipped with tight fitting seals around all openings, such as doors, windows, seems, etc., so as to prevent the escape of particulate material to the ambient air while in use.
- 3-5. This unit shall only use steel shot abrasive media exempt from certification requirements of the California Air Resources Board (CARB).
- Abrasive blasting operations shall not discharge into the atmosphere emissions
 which have an opacity of 20 % or greater for more than three minutes in any one
 hour.
- 7. An operation log shall be maintained on- site for at least five (5) years and be made available to District personnel on request. This log shall contain, as a minimum, the type, amount and dates of use.

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Conditions for units with permit numbers: A0050147 and A0050157

- 1. An operation log shall be maintained on site for at least five (5) years and be made available to District personnel on request. This log shall contain, as a minimum, the type, date, and the amount of blasting material added to this cabinet.
- 2. Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit is issued unless specifically exempted hereunder.
- 3. This equipment shall be operated and maintained in strict accord with the recommendations of the manufacturer/supplier and/or sound engineering principles.

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Conditions for units with permit numbers: A005113

III - 5 Enclosure 2

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- -This abrasive blast booth shall not be operated unless it is vented to a functioning air
 pollution control device eovered by operating under a-valid District permit number
 C010410, or which are an integral part of the equipment.
- This abrasive blast booth must be equipped with tight fitting seals around all openings, such as doors, windows, seams, etc., so as to prevent the escape of particulate materials to the ambient air while in use.
- 3. An annual compliance/certification test of this unit for particulate and PM₁₀ is not required. However, the owner/operator shall conduct such testing upon District request and shall be in accordance with the District's "Compliance Test Procedural Manual.":
- 4. This abrasive blast booth shall only be operated and maintained in strict accordance with manufacturer's and/or supplier's recommendations and/or sound engineering principles.

Conditions for units with permit number: A008793

- The owner/operator shall maintain an operations log for this system. This log shall be maintained current, and on-site for a minimum of five (5) years and provided to District, state, or federal personnel on request, and include at least the following information:
 - a. Dates and results of periodic emission point observations.
 - b. Daily amount and type of abrasive consumed.
- This system shall not discharge into the atmosphere emissions, which have an_opacity
 greater than 1020%. Compliance with this condition shall be determined through
 periodic (at least once per month) visual observations of the dust collector exhaust point
 during abrasive blast operations.
- Abrasive blasting shall not occur within this unit unless it is actively exhausting through the filtering unit with valid District Ppermit number C008808.
- 4. This abrasive blast booth shall only be operated and maintained in strict accord with manufacturer's and/or supplier's recommendations and/or sound engineering principles.
- This booth shall only be used for abrasive blasting. no coating or other solventconsuming activity shall be performed within it.

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [Rule 401 - Visible Emissions; Version in SIP = CARB Ex. Order G-73, 40 CFR

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52.220(c)(39)(ii)(B) - 09/08/78 - 43 FR 40011; Current Rule Version = 07/25/77] [Rule 404 - *Particulate Matter Concentration*; Version in SIP = Current, 40 CFR 52.220(c)(42)(xiii)(A) - 12/21/78 - 43 FR 52489] [Rule 405 - *Solid Particulate Matter, Weight*; Version in SIP = Current, 40 CFR 52.220(c)(42)(xiii)(A) - 12/21/78 43 - FR 52489]

Conditions for units with permit numbers: A009130 and A009131-

- 1. This abrasive blast booth shall only be operated and maintained in strict accordance with manufacturer's/suppliers recommendations and/or sound engineering principles.
- This abrasive blast booth shall no be operated unless it is vented to the functioning air
 pollution control device covered by valid District <u>Ppermit number C009132</u>. [Note:
 C009133 for A009131]
- 3. This abrasive blast booth must be equipped with tight fitting seals around all openings, such as doors, windows, seams, etc., so as to prevent the escape of particulate matter to the ambient air while in use.
- 4. An annual compliance/certification test (source test) of this unit for particulate and PM₁₀ is not required. However the o/o shall conduct such testing upon District request and shall be in accordance with the District's "Compliance Test Procedural Manual."

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [Rule 401 - *Visible Emissions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 09/08/78 - 43 FR 40011; Current Rule Version = 07/25/77]

B. BASIC EQUIPMENT TO INCLUDE BOILERS, PAINT DRYING AND CURING OVENS, DYNAMOMETERS, VEHICLE UNDERCOATING RACKS, AND OILWATER SEPARATORS, described as follows:

BOILER, MDAQMD permit number B000935 (Bldg. 574, HP_5) Consisting of: BOILER NUMBER 7, HIGH TEMPERATURE HOT WATER which consists of a boiler described as International Boiler Works Inc. Type and Size TJW-C-25, with a heat input rating of 32 million Btu/hr, built in 1976. The burner is a Combustion Specialty Incorporated CS-WT style, 25wt-N306 Model, natural gas/oil fired. Electrical motors associated with this boiler are for the fans and the hot water distribution pump whose total is 30 hp. This total hp does not significantly affect the fee structure.

BOILER, MDAQMD permit number B000936 (Bldg. 574, HP_5) consisting of: BOILER

NUMBER 8, HIGH TEMPERATURE HOT WATER which consists of an International Boiler Works Inc. – Lamont FCW-C-25 HTHW a heat input rating of 32 million Btu/hr. The burner is a Combustion Specialty Incorporated CS-WT style, 25wt-N306 Model, natural gas/oil fired. Electrical motors associated with this boiler are for the fans and the hot water distribution pump whose total is 30 hp. This total hp does not significantly affect the fee structure.

BOILER, MDAQMD permit number B000937 (Bldg. 574, HP_5) consisting of: BOILER NUMBER 9, HIGH TEMPERATURE HOT WATER which consists of an International Boiler Works Inc. – Lamont FCW-C-25 HTHW a heat input rating of 32 million Btu/hr. The burner is a Combustion Specialty Incorporated CS-WT style, 25wt-N306 Model, natural gas/oil fired. Electrical motors associated with this boiler are for the fans and the hot water distribution pump whose total is 30 hp. This total hp does not significantly affect the fee structure.

Conditions for units with permit number: B000935-

- This unit shall be operated and maintained in strict accord with manufacturer's and/or supplier's recommendations or sound engineering principles.
- 2. This boiler is limited to using only pipeline natural gas or No. 2 fuel oil.
- 3. The owner/operator (o/o) shall not use No. 2 fuel oil in this unit whose sulfur concentration exceeds 0.05% 0.0015% on a weight basis. The o/o may use the fuel supplier's analytical data, provided it is kept with the log. At the discretion of the District, samples of fuel oil may be taken and submitted for analysis by ASTM methods D-2622-82, D-4294 or other method, which the District deems to be equivalent.
- 4. The o/o shall maintain a log for this equipment, which at a minimum contains the information specified below. This log shall be maintained current and on-site for a minimum of five (5) years and shall be provided to District, state or federal personnel on request:
 - a. Fuel consumption and type, per calendar day and cumulative annual (calendar vear):
 - b. Annual compliance test or tune-up verification;
 - c. Fuel sulfur concentration of fuel oil, if used.
- 5. This unit shall meet the following emission limits, when the annual heat input is greater than or equal to 50,000 MMBtu (corrected to 3% oxygen):
 - a. Carbon monoxide less than 400 ppmvd;

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III - 8 Enclosure 2

- b. NO_x less than 70 ppmvd, and/or 0.084 lb/MMBtu of heat input, when operated on gaseous fuel;
- c. NO_x less than 115 ppmvd, and/or 0.150 lb/MMBtu of heat input, when operated on liquid and/or solid fuels.
- 6. This equipment shall be tested to determine compliance with the above-emission limits through emissions compliance testing, according to Rule 1157, not less than once every twelve (12) monthsannually. A tune-up may be performed in lieu of a compliance test for years when the annual heat input is less than 50,000 MMBtu. The boilers with valid District permit numbers B000935, B000936, and B000937 represent three identical linked boilers. If the annual heat input of these units combined is above 50,000 MMBtu, then the emission limits presented above apply. FRule 1157 Boilers and Process Heaters; Version in SIP = Current, 40 CFR 52.220(c)(207)(I)(D)(3) 5/19/97 _61 FR 56470, effective 11/1/96] [Rule 204 Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) 11/09/78 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6 (a)(3)(i)(B) Periodic Monitoring Requirements] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

Conditions for units with permit numbers: B000936, and B000937.

- 1. This unit shall be operated and maintained in strict accord with manufacturer_s and/or supplier_s recommendations or sound engineering principles.
- 2. This boiler is limited to using only pipeline natural gas or No. 2 fuel oil.
- 3. The owner/operator (o/o) shall not use No. 2 fuel oil in this unit whose sulfur concentration exceeds 0.05 0.0015% on a weight basis. The o/o may use the fuel supplier's analytical data, provided it is kept with the log. At the discretion of the District, samples of fuel oil may be taken and submitted for analysis by ASTM methods D-2622-82, D-4294 or other method, which the District deems to be equivalent.
- 4. The o/o shall maintain a log for this equipment, which at a minimum contains the information specified below. This log shall be maintained current and on-site for a minimum of five (5) years and shall be provided to District, state or federal personnel on request:
 - a. Fuel consumption and type, per calendar day and cumulative annual (calendar year);
 - b. Annual compliance test or tune-up verification;
 - c. Fuel sulfur concentration of fuel oil, if used.

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III - 9 Enclosure 2

- 5. This unit shall meet the following emission limits, when the annual heat input is greater than or equal to 50,000 MMBtu (corrected to 3% oxygen):
 - a. Carbon monoxide less than 400 ppmvd;
 - b. NO_x less than 70 ppmvd, and/or 0.084 lb/MMBtu of heat input, when operated on gaseous fuel;
 - c. NO_x less than 115 ppmvd, and/or 0.150 lb/MMBtu of heat input, when operated on liquid and/or solid fuels.
- 6. This equipment shall be tested to determine compliance with the above emission limits through emissions compliance testing, according to Rule 1157, not less than once every twelve (12) monthsannually. A tune-up may be performed in lieu of a compliance test for years when the annual heat input is less than 50,000 MMBtu. The boilers with valid District permit numbers B000935, B000936, and B000937 represent three identical linked boilers. If the annual heat input of these units combined is above 50,000 MMBtu, then the emission limits presented above apply.
- This equipment shall be operated in compliance with 40 CFR 60 Subpart Dc-Standards for ——Small Industrial-Commercial-Institutional Steam Generating Units.

[Rule 1157 - Boilers and Process Heaters; Version in SIP_Approved 4/10/00 = Current, 65 FR 18901. 40 CFR 52.220(c)(268)(8)(i)(B)(1); Approved 11/1/96 - 40 CFR 52.220(c)(207)(I)(D)(3) - 5/19/97 61 FR 56470, effective 11/1/96; Current Rule Version 5/19/97]

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)] [40 CFR PART 60 SUBPART Dc - STANDARDS OF PERFORMANCE FOR SMALL INDUSTRIAL-COMMERCIAL-INSTITUTIONAL STEAM GENERATING UNITS, 55 FR 37683, Sept. 12, 1990, as amended at 65 FR 61753, 10/17/00Oet. 17, 2000]

[40 CFR PART 60 SUBPART A – GENERAL PROVISIONS, 36 FR 24877, 12/23/71Dec. 23, 1971]

<u>PAINT DRYING OVEN, MDAQMD permit number B002875</u> consisting of: BUILDING 573, Area 18; Devilbiss Model 1251-59; heated with 400 deg F water, nominal setting 250 deg F, normal operating range 125 – 150 deg F. Air flow rate: 35, 800 ACFM, 7.5 bhp.

Conditions for units with permit numbers: B002875-

 This paint-drying oven shall only process items, which have a wet surface coating, which was applied to the item at this USMC Logistics Base.

This paint drying oven shall only be operated/maintained in strict accord<u>ance</u> with manufacturer's/supplier's recommendations and/or sound engineering principles.
 [Rule 204 - *Permit Conditions*; Version in SIP <u>Approved 11/09/78</u> = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) <u>and 40 CFR 52.220(c)(31)(vi)(C) 11/09/78</u>, 43 FR 52237; Current Rule Version = 07/25/77]

<u>DYNAMOMETER TEST STAND, MDAQMD permit number B003969</u> consisting of: BLDG-ldg. 573, East Hardstand, for Paxman IC Engine Determinations.

<u>DYNAMOMETER</u>, <u>MDAQMD</u> permit number <u>B004397</u> consisting of: <u>BUILDINGldg</u>. 573, Area 16; Unit No. 1, for testing diesel engines, 400 bhp maximum, located in room approx. 10'1 x 14'w x 12'h.

<u>DYNAMOMETER, MDAQMD</u> permit number <u>B004398</u> consisting of: <u>BUILDING-Bldg.</u> 573, Area 16; Unit no. 2, for testing diesel engines, 800 bhp maximum, located in room approx. 10'1 x 14'w x 12'h.

<u>DYNAMOMETER, MDAQMD permit number B004399</u> consisting of: <u>BUILDING Bldg.</u>573, Area 16; Unit No. 3, for testing diesel engines, 800 bhp maximum, located in room approx. 10'1 x 14'w x 12'h.

<u>DYNAMOMETER, MDAQMD permit number B004400</u> consisting of: BUILDING<u>Idg.</u> 573, Area 16; Unit no. 4, for testing diesel engines, 800 bhp maximum, located in room approx. 10'l x 14'w x 12'h.

<u>DYNAMOMETERSPIN TEST CELL, MDAQMD permit number B004401</u> consisting of: B<u>UILDINGIdg.</u> 573, Area 16; Unit No. 5, for testing diesel engines under no load, located in room approx. 10'l x 14'w x 12'h.

<u>DYNAMOMETER</u>, <u>MDAQMD</u> <u>permit number B004402</u> consisting of: <u>BUILDINGldg.</u> 573, Area 16; Unit No. 6, for testing diesel engines, 1500 bhp maximum, located in room approx. 10'1 x 14'w x 12'h.

<u>DYNAMOMETER, MDAQMD permit number B004403</u> consisting of: B<u>UILDINGldg.</u> 573, Area 16; Unit No. 7, for testing diesel engines, 1500 bhp maximum, located in room approx. 10'1 x 14'w x 12'h.

Conditions for units with permit numbers: B003969-

- 1. The owner/operator (o/o) shall operate this equipment in strict accordance with the manufacturer's specifications and/or sound engineering principles.
- 2. The o/o shall maintain a log of operations on this equipment, <u>current and on-site</u>, for a minimum of five years, and this log shall be provided to the District, State, or <u>Federal personnel on request</u>. This log shall include, which contains at a minimum, the following:
 - a. Fuel consumed by the operating engines:
 - b. Date, time, and length of times of each engine 's operation; and
 - c. Brake hp of the engine developed at maximum during testing.
- 3. The o/o shall keep a log the on site for a minimum of five (5) years and provide it to the District, state or federal personnel on request.
- 43. The engines tested are limited to using diesel fuel whose sulfur content does not exceed 0.05 0.0015% on a weight per weight basis.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

Conditions for units with permit numbers: B004397, B004398, B004399, B004400, B004401, B004402, and B004403-

- 4.1. Operation of this equipment or spin test cell shall be conducted in compliance with data and specifications submitted with the application under which this permit was issued unless otherwise stated below.
- 5.2. The owner/operator (o/o) shall operate this equipment or spin test cell in strict accord with the manufacturer's specifications and/or sound engineering principles.
- 6-3. The o/o shall maintain a log of operations on for this equipment or spin test cell, current and on-site, for a minimum of five years, and this log shall be provided to the District, state, or federal personnel on request. This log shall include which contains at a minimum, the following:
 - a. Fuel consumed by the operating engines;
 - b. Date, time, and length of times of each engine's operation; and
 - c. Brake hp of the engine developed at maximum during testing.
- 4. The o/o shall keep the log on site for a minimum of five (5) years and provide it to the District, state or federal personnel on request.
- 54. The engines tested are limited to using diesel fuel whose sulfur content does not exceed 0.05%0.0015% on a weight per weight basis.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

VEHICLE UNDERCOATING COMPLEX (BLDGldg. 634); MDAQMD Permit Number B004194

One 20' high by \underline{x} 18' wide by \underline{x} 55' long undercoat booth with pit (Undercoat Booth #2), TECD201860PDT, with 90 20" x 20" intake filters, single stage exhaust filtration (90 20" x 20" filters), with 39,000 cfm of air flow. Three identical 20' high by \underline{x} 20' wide by \underline{x} 20' undercoat areas with 40,000 cfm of air flow each.

Conditions for units with permit number: B004194

- 1. The total VOC emissions for this undercoating rack and the undercoating rack covered by District Ppermit number B004753 shall not exceed 250 pounds per day.
- 2. This equipment (and related application equipment) shall be operated in compliance with all data and specification submitted with the application under which this permit is issued unless otherwise noted below.

- This equipment (and related application equipment) shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.
- 4. Only High Volume Low Pressure Pressure Low Volume (HVLPHPLV) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in this equipment unless prior written approval is obtained from the District.
- 5. Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 1.5-2.5 inches WC.
- The pressure drop across the discharge filters shall be taken and recorded in the operational log each day the booth is in operation.
- 7. The owner/operator (o/o) shall maintain current and on-site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to the District, state, or federal personnel upon request and shall include, at a minimum, the following information:
 - **a.d.** Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning and cleanup or other).
 - b.e. VOC content of each type of coating and solvent in pounds per gallon or grams per liter;
 - e.f. The method of application and type of substrate for each use;
 - d.g. Total VOC emissions in pounds per calendar day; and
 - e.<u>h.</u>Discharge filter pressure drop.

8. The total amount of photo chemically reactive VOC solvents released to the atmosphere from this undercoating complex is limited to 39.6 lbs per calendar day. [Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)] [Rule 1115 - Metal Parts and Products Coating Operations; Version in SIP = Current, 40 CFR 52.220(c)(239)(i)(A)(2) - 12/23/97 - 62 FR 67002, effective 2/23/98] [Rule 442 - Usage of Solvents, Approved 6/9/82, 47 FR 25013, 40 CFR 52.220(c)(51)(xii)(B); Approved 9/8/78, 43 FR 40011, 40 CFR 52.220(c)(39)(ii)(C)]

<u>VEHICLE UNDERCOATING RACK, MDAQMD permit number B004753</u> consisting of: BUILDING dg. 203, NE Corner West Hardstand; 90' x 20' rack consisting of six (6) bays

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with undercoating on four (4) bays equipped with Mohawk Lifts and airless spray guns. Ashland Chemical Co. undercoating materials Tectyl 185 GW, Tectyl 2423, or equivalent.

Conditions for units with permit number: B004753

- Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
- This equipment (and related application equipment) shall be operated in compliance with all data and specification submitted with the application under which this permit is issued unless otherwise noted below.
- 3. A daily record shall be maintained of the VOC emissions from this source which contains, for each day equipment is in operation but is not limited to, the following:
 - a. Manufacturer and brand name of undercoating used Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning and cleanup or other).
 - b. VOC limit (non-photochemically reactive) content of each type of coating and solvent in pound per gallon or grams per liter;
 - c. VOC limit (photochemically reactive) The method of application and type of substrate for each use
 - d. Quantity of coating used Total VOC emissions in pounds per calendar day.
- 34. The daily log shall be maintained on site for a minimum of five (5) years and be provided to District, state, or federal personnel on request.
- 45. The total VOC emissions for this undercoating rack and the undercoating rack covered by District Permit B004753 number B004194 (photochemically reactive and non photochemically reactive) shall not exceed 250 pounds/day.
- The total amount of photochemically reactive VOC solvents released to the atmosphere from this undercoating complex is limited to 39.6 lbs per calendar day.
- Only High Pressure Low Volume (HPLV) spray guns, hand-held Aerosol Coating
 Products, or Hand Application Methods shall be used in this equipment unless prior
 written approval is obtained from the District.

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77][40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)][Rule 1115 - Metal Parts and Products Coating Operations; Version in SIP = Current, 40 CFR 52.220(c)(239)(i)(A)(2) - 12/23/97 - 62 FR 67002, effective 2/23/98][Rule 442 - Usage of Solvents, Approved 6/9/82, 47 FR 25013, 40 CFR 52.220(c)(51)(xii)(B); Approved 9/8/78, 43 FR 40011, 40 CFR 52.220(c)(39)(ii)(C)]

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AIR STRIPPER, MDAQMD permit number B004496 (Bldg. 609) consisting of: Carbonair Environmental Systems unit collects VOCs from the Water Oil Separator, vented to the Thermal Oxidation/Scrubber.

Conditions for units with permit numbers: B004496.

- 1. The technical submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted hereunder.
- The owner/operator shall operate and maintain all equipment in strict accord with the
 design and/or sound engineering principles which produce the minimum emission of
 contaminants.
- U. The equipment shall operate concurrently with the scrubber under valid District permits C004497, C004498, B004499 and B004500.

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(e)(39)(ii)(B) 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77]

OIL-WATER SEPARATORS, MDAQMD permit number B004499 consisting of: BUILDINGIdg. 609; Great Lakes Environmental, Inc., Slant Rib Coalescing Separator I and II, Model SRC-75, with pumps, electrical, tanks, and other appurtenances (see Engineering Evaluation). Note: Much of the equipment ancillary to this unitOil-Water Separator I is common to B004500, Oil-Water Separator II. B004499 and B004500Oil-Water Separator I and Oil-Water Separator II may function separately or simultaneously. This unit receives flow from the Raw Storage Tanks (T-1 and T-2) rejects oily discharge to Oily Water Storage Tanks (T-3 and T-20) and discharges into the ultra filtration system.

OIL WATER SEPARATOR, MDAQMD permit number B004500 (Bldg. 609) consisting of Great Lakes Environmental, Inc., Slant Rib Coalescing Separator II, Model SRC 75, with pumps, electrical, tanks and other appurtenances (see Engineering Evaluation). Note: Much of the equipment ancillary to this unit is common to B004499, Oil Water Separator II. B004499 and B004500 may function separately or simultaneously.

Conditions for units with permit numbers: B004499, B004500.

- 1. The engineering and design submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted above below.
- 2. The owner/operator (o/o) shall operate all equipment described in this permit in strict accord<u>ance</u> with the design and/or sound engineering principles which produce the minimum emission of air contaminants.

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- 3. The o/o shall maintain a current, on-site log for this equipment for a minimum of five (5) years and shall provide this log to the District, state, or federal personnel upon request. The log shall include at least the following information:
 - a. Monthly volume of liquid entering the oil-water separators (in gallons)=; and
 - b. Date and Volume of any liquids disposed of to Ccertified off-base handling facilities from Tank T-12 (in gallons).

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

WASTEWATER TREATMENT PLANT/RECYCLING FACILITY (Bldg. 609) MDAQMD permit number B008746 consisting of:

T-1, Tank, 21,000 gal, w/oil skimmer, 16"0".

T-2, Tank, 21,000 gal, w/oil skimmer, 16"0".

T-12, Tank, Sludge HoldingOily Water, for disposal only, 3,500 gal-

T-20, Tank, Oily Water, for disposal only, 4" h x 11' 6" dia, 1,008 gal-

T-3, Tank, Oily Water, for disposal only, 3,486 gal-

T-30, Tank, Ultra Filtration Process, 10,000 gal-

T-29, Tank, Ultra Filtration Process, (Permeate Transfer Tank), 1,000 gal-

T-15, Tank, Low Purity Water Storage, 17' h x 16' dia,, 25,000 gal,

T-33, Tank, Reverse Osmosis Feed, 3,000 gal₇

T-16, Tank, High Purity Water Storage, 12' h x 12' dia,, 10,000 gal,

Grit Washer Separator

Sand Filters, (2)

Filter Press

Ultra Filtration Unit

Carbon Units

Reverse Osmosis Unit

P-1A, 0.7 hp, Transfer industrial wastewater to Bldg 609

P-1B, 0.7 hp, Transfer industrial wastewater to Bldg 609

P-2A, 0.5 hp, Transfer industrial wastewater to oil-water separator at T-1, T-2-

P-2B, 0.5 hp, Transfer industrial wastewater to oil-water separator at T-1, T-2-

P-67A, 0.3 hp, Transfer sludge from T-1 to T-12 at T-1, T-2

P-67B, 0.3 hp, Transfer sludge from T-2 to T-12 at T-1, T-2

P-63, 0.1 hp, Transfer sludge from T-1, T-2 to T-3 at T-1, T-2

P-5A, 0.2 hp, Transfer oil/water separator effluent to T-30 at oil/water separator

P-5B, 0.2 hp, Transfer oil/water separator effluent to T-30 at oil/water separator

P-3A, 0.8 hp, Transfer oil from oil/water separator #1 to T-3 at oil/water separator

P-3B, 0.8 hp, Transfer oil from oil/water separator #2 to T-3 at oil/water separator P-4A, Transfer oily sludge from oil/water separator #1 to T-20 at oil/water separator; pneumatic

P-4A4B, Transfer oily sludge from oil/water separator #2 to T-20 at oil/water separator; pneumatic

Water Pump, 2.0 hp, Circulate cleaning and rinse water thru ultra filtration unit at ultra filtration unit

Sludge Pump, Transfer sludge from T-30 to T-3 at ultra filtration unit, pneumatic P-50, 2.0 hp, Ultra Filtration Feed Pump supplies positive pressure to P-49 at ultra filtration unit

P-49, 6.0 hp, Circulates industrial wastewater through ultra filter unit at ultra filtration unit

P-51, 0.1 hp, Transfers ultra filtered permeate from T-29 to T-15 at ultra filtration unit P-20A, 0.5 hp, Supplies T-15 water to carbon units- to air stripper or AOP at carbon units P-20B, 0.5 hp, Supplies T-15 water to carbon units- to air stripper or AOP at carbon units P-37, 0.8 hp, Supplies clean water from T-16 to carbon units for backwash

P-56A, 0.3 hp, Supplies water to RO booster pumps from T-33 at AOP

P-56B, 0.3 hp, Supplies water to RO booster pumps from T-33 at AOP

P-23, 0.1 hp, Pumps RO brines to basins from T-19 at brine storage tank

P-21A, 2.5 hp, Supplies water to RO membranes at RO

P-21B, 2.5 hp, Supplies water to RO membranes at RO

P-50, 0.5 hp, Circulates cleaning water from T-29 through RO at RO

P-52, 0.3 hp, Supplies water from T-16 to T-29

Water Pump, 0.3 hp, Supply water from scrubber pump to various pumps on scrubber

P-19A, 0.5 hp, Supply water from carbon units to top of stripper tower

P-19B, 0.5 hp, Supply water from carbon units to top of stripper tower

P-54, 0.8 hp, Circulates cleaning water through stripper tower

P-38, 1.2 hp, Pumps effluent from stripper to T-33

P-22A, 0.8 hp, Transfer treated water to steam rack

P-22B, 0.8 hp, Transfer treated water to steam rack

P-14, Transfer sludge to filter press at T-12, pneumatic

P-39, 0.2 hp, Supplies permeate from brine storage tanks (T-19) to T-16

P-41A, 0.2 hp, Pumps sump to T-1 and T-2 by T-1, T-2

P-41B, 0.2 hp, Pumps sump to T-1 and T-2 by T-1, T-2

P-42A, 0.2 hp, Pumps sump to T-1 and T-2 by oil/water separator

P-42B, 0.2 hp, Pumps sump to T-1 and T-2 by oil/water separator

P-43A, 0.2 hp, Pumps sump to T-1 and T-2 by ultra filtration tank

P-43B, 0.2 hp, Pumps sump to T-1 and T-2 by ultra filtration tank

P-44A, 0.2 hp, Pumps sump to T-1 and T-2 by ultra filtration tank

P-44B, 0.2 hp, Pumps sump to T-1 and T-2 by ultra filtration tank

P-45A, 0.2 hp, Pumps sump to T-1 and T-2 by RO

P-45B, 0.2 hp, Pumps sump to T-1 and T-2 by RO

P-46A, 0.2 hp, Pumps sump to T-16 by T-16

P-46B, 0.2 hp, Pumps sump to T-16 by T-16

Total Pump Capacity: 29.9 27.2hp

Conditions for unit with permit number: B008746-

- 1. The owner/operator shall operate all equipment described in this permit in strict accord with the design and/or sound engineering principles which produce the minimum emission of air contaminants.
- 3.2. A log of operating hours when attended by and operator, time and date shall be maintained current, on-site for a minimum of five (5) years and provided to the District personnel on request.
- 2.3. The engineering and design submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted above.

PAINT PYROLYSIS OVEN, MDAQMD permit number B008890 consisting of: Adjacent to bBuildlindg_#-634, NW. Hardstand, Steelman Industries, Model 666BA-C, 6' w x 6' d x 6' h; advanced burn-off (cleaning) with rear burners and top down heating, 305,000 Btu/hr primary burner @ 900 degree F; 470,000 Btu/hr afterburner @ 1,800 degrees F.

Conditions for unit with permit number: B008890-

- The owner/operator shall install, maintain, and operate all equipment described in this
 permit in strict accord with the recommendations of the manufacturer/supplier and/or
 sound engineering principles which produce the minimum emission of air
 contaminants.
- 2. The owner/operator is limited to using only regulated pipeline natural gas in this equipment.
- 3. An operator's log for this equipment shall be maintained on-site for at least five (5) years and made available to District personnel upon request. This log shall include at least the following information:
 - (a) The number and type of items heated each day:
 - (b) The daily hours of operation:
 - (c) Total annual operation of this equipment in hours; and
 - (d) The total amount of natural gas consumed daily.

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TRAY STRIPPER, AERATION UNIT (Bldg. 609) MDAQMD permit number B008921 consisting of: BLDG 609, Shallow tray low profile, Model No. 2641, with ancillary equipment. This unit receives flow from the reverse osmosis system and discharges into the High Purity Water Storage Tank T-16. includes a

7.5 hp permeate pump and 7.5 hp blower.

Conditions for unit with permit number: B008921-

- The owner/operator shall operate this equipment This unit shall be installed, operated and maintained in strict_accord with those recommendations of the manufacturer's /supplier-specifications and/or sound engineering principles.
- This unit is an integral part of the Industrial Wastewater Treatment and Recycling facility, Building 609 and shall operate concurrently with associated valid District permits B004496, C004497, C004498, and B004500, as applicable.
- 32. A log of operating hours, times, and date shall be maintained current, and on- site for a minimum of five (5) years and provided to District personnel upon request.
- C. <u>AIR POLLUTION CONTROL DEVICES TO INCLUDE FABRIC DUST</u>
 <u>COLLECTORS, THERMAL OXIDIZERS, CAUSTIC SCRUBBERS, AIR</u>
 POLLUTION CONTROL SYSTEMS, AND HEPA VACS, described as follows:

<u>DUST COLLECTOR</u>, <u>MDAQMD</u> permit number <u>C003245</u> consisting of: <u>BUILDING</u> Bldg. 570,

Big Blast; Booth Ventilation System, North Unit.

Manufacturer: Torit Model No.: DFT 4-176 Type: Cartridge pulse jet Number of Bags: 176,

Bag Dimensions: 13.84" x 25" cartridge filters, totaling 44,700 square feet of filter area

Air Flow Rate: 97,700 ACFM Air to Cloth Ratio: 2.2:1 Hopper Discharge Valve: 3 hp

500 cfm from elevator and abrasive separator

<u>DUST COLLECTOR</u>, <u>MDAQMD</u> permit number C003247 consisting of BUILDING ldg.

570.

__Big Blast; Booth Ventilation System, South Unit.

Manufacturer: Torit Model No.: DFT 4-176

Type: Cartridge pulse jet Number of cartridges: 176,

Bag Dimensions: 13.84" x 25" cartridge filters, totaling 44,700 square feet of filter area

Air Flow Rate: 97,700 ACFM Air to Cloth Ratio: 2.2:1 Hopper Discharge Valve: 3 hp

500 cfm from elevator and abrasive separator

Conditions for units with permit numbers: C003245, and C003247;

- This unit shall be operated and maintained in strict accord with the recommendations
 of the manufacturer/supplier and/or sound engineering principles, which produce the
 minimum emissions of contaminants.
- 2. This dust collector shall operate concurrently with the corresponding Abrasive Blasting Booth (A000951 for C003245 and A000952 for C003247).
- 3. The o/o shall conduct a minimum program of <u>inspection and</u> maintenance on this equipment. The owner/operator shall maintain current and on_site for five (5) years a log of the following information, which shall be provided to District-personnel upon request:
 - a. <u>Weekly Quarterly</u> dust collector stack observation date and result (using USEPA Method 22, and USEPA Method 9 if necessary);
 - b. Quarterly cartridge suspension system inspection date and results-;
 - Date of cartridge replacement; and
 - d. Date and nature of any system repairs.
 - 4. This dust collector shall discharge no more than 5.0 pounds per hour of PM₁₀ at _______
 a maximum concentration of 0.006 grains/dscf at the operating conditions ______
 given in the above description (BACT). This equipment does not require a regularly scheduled emission compliance test. However, emission compliance testing may be required at the discretion of the District.
- 5. The system shall be equipped with sensors that monitor the integrity of cartridges. The ___system shall be automatically shuts-down if the sensors indicate that the cartridge ____ performance is compromised.

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)] [40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements]

DUST COLLECTOR, MDAQMD permit number C003961 consisting of: BUILDING

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<u>Idg.</u> 569, Blast Coast Systems, Inc., Model BCSABS-4-48, 26,900 cfm, cartridge filter with pulse jet cleaning, 48 pleated cartridges, air to cloth ratio: 2.2:1, with 60 hp electric motors, 99.999% efficiency to 0.5 microns.

Conditions for unit with permit number: C003961-

- 1. The o/o shall maintain this dust collector in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles.
- The system shall be equipped with sensors that monitor the integrity of the cartridges.
 The system shall be automatically shuts down if the sensors indicate that the cartridge performance is compromised.
- 3. The o/o shall install and maintain a device, which measures the pressure differential across the filters if one is not provided with the unit.
- 4. This dust collector shall operate concurrently with the equipment described in District permit number A003959.
- 4.5 The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The o/o shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, state, or federal personnel upon request:
 - a. Monthly Quarterly dust collector stack observation date and result (using USEPA Method 22, and USEPA Method 9 if necessary);
 - b. <u>Monthly Quarterly</u> cartridge and cartridge suspension system inspection date and results:
 - e. Monthly reading of cartridge pressure drop, date, and value
 - c. Date of cartridge replacement; and
 - d. Date and nature of any system repairs.

-[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

THERMAL OXIDIZER, MDAQMD permit number C004497 consisting of: BUILDING 609; Air Chem Systems, Inc., controls VOCs from the Air Stripper (Permit C004498).

Conditions for units with permit numbers: C004497.

 The owner/operator shall operate and maintain all equipment in strict accord with the design and/or sound engineering principles which produce the minimum emission of contaminants. **Formatted:** Indent: Left: 1.19", Hanging: 0.31", Outline numbered + Level: 2 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 1.19" + Tab after: 1.44" + Indent at: 1.44", Tab stops: Not at 1.44"

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- This equipment shall operate concurrently with the scrubber under valid District permit C004498
- The technical submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted hereunder.

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[Rule 204 - Permit Conditions; Version in SIP - CARB Ex. Order G-73, 40 CFR
52.220(e)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77]
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CAUSTIC SCRUBBER, MDAQMD permit number C004498, consisting of: BUILDING 609; Air Chem Systems, Inc. controls acid gases from the Thermal Oxidizer (Permit C004497), particularly hydrogen chloride from the combustion of chlorinated solvents.

Conditions for unit with permit number: C004498.

- 1. The technical submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted hereunder.
- The owner/operator (o/o) shall operate and maintain all equipment in strict accord with the design and/or sound engineering principles which produce the minimum emission of contaminants.
- The equipment shall operate concurrently with the thermal oxidizer under valid District permit C004497.
- The maximum concentration of hydrogen chloride emitted shall be 1.0 mg/SCF.
- Emissions measurements for VOC and hydrogen chloride shall be conducted in odd years. The testing protocol which shall be followed are those of document 97-675-215-07. No changes may be made to this protocol without the prior written approval of the APCO. Other measurements shall include but not be limited to destruction removal efficiency, moisture concentrations, temperature, flow rate and carbon dioxide concentrations.
- The o/o shall notify the District a minimum of 10 days prior to compliance testing to allow staff to arrange schedules to observe the testing. Final test reports shall be delivered to the District not later than 45 days after the last day of on-site measurements and sampling, and not later than six weeks prior to the expiration date of this permit in each odd year.

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[Rule 204 - Permit Condit.
         Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78
[40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]
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[40 CFR 70.6 (a)(3)(i)(B) Periodic Monitoring Requirements

AIR POLLUTION CONTROL SYSTEM, MDAQMD permit number C004561, (Bldg. 573 outside NW corner) consisting of: An inlet filtration system (4" heating ventilation and air conditioning-type prefilter, 12" second stage pleated filter, and a 12" third stage high efficiency

particulate air filter), dual activated carbon absorption beds (25,000 pounds each), a water recycling tank, two 150 hp blowers producing 45,000 cfm of flow, and an electrical control system. A containerized biofiltration system may be installed prior to the carbon beds, consisting of a 30' H FRP biotrickling filter, and 8' by 10' by 20' H compost-based biofilter, a 30 hp plus fan, and two recirculation pumps (5 and .75 hp).

Conditions for unit with permit number: C004561

- 1. The owner/operator (o/o) shall operate this equipment in strict accord with the manufacturer's specifications and/or sound engineering principles.
- The exhaust from the paint booth covered by District permits S002873 and S004558 shall be ducted to this APCS.
- 3. The total quantity of Volatile Organic Compound (VOC) emissions discharged to the atmosphere from the APCS shall not exceed 60 lbs per calendar day per paint booth vented, verified through VOC use and Flame Ionization Detector (FID) data.
- This APCS shall operate with an overall <u>eapture_control</u> efficiency of 90%, <u>verified using FIDs before the inlet to the carbon bed and FIDs in the outlet to the atmosphere.</u>
- 5. The o/o shall maintain a current_{ax}-on-site operational log for this device. This log shall be retained for five (5) years and shall be provided to District, state or federal personnel upon request. The operational log shall include the following information at a minimum:
 - a. Booths vented to the device;
 - b. Daily usage of coating and solvent in gallons, VOC content of each material in pounds per gallon, and total VOC emissions in pounds, within booths vented to this device-2
 - c. At least hourly FID readings at the inlet to the carbon beds and the exhaust to the atmosphere when booths being controlled are in operation; and,
 - d. Net VOC emissions to the atmosphere (after all control devices) in pounds per day.
- 6. The o/o may modify the pre-treatment system (system or systems in the process stream after the booths but before the carbon beds) with written permission from the District.

7. Operation of the FIDs monitoring this equipment is subject to Rule 218 – Stack Monitoring, specifically sections 218(c), 218(d), and 218(f). The o/o shall operate the FIDs in compliance with Rule 218 at all times.

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)] [40 CFR 70.6 (a)(3)(i)(B) - Periodic Monitoring Requirements] [Rule 1115 - Metal Parts and Products Coating Operations; Version in SIP = Current, 40 CFR 52.220(c)(239)(i)(A)(2) - 12/23/97 - 62 FR 67002, effective 2/23/98]

<u>HEPA VAC, MDAQMD permit number C005009</u> (Bldg. 573 near 12th & C Sts) consisting of: Nilfisk, Model No. GS-82, with primary and secondary HEPA filters. The HEPA filter is 99.9% efficient for collection of all particles whose mean diameter is equal to or greater than 0.3 microns.

HEPA VAC, MDAQMD permit number C005010 (Bldg. 632) consisting of: Nilfisk, Model No. GS-80, with primary and secondary HEPA filters. The HEPA filter is 99.9% efficient for collection of all particles whose mean diameter is equal to or greater than 0.3 microns.

<u>HEPA VAC, MDAQMD permit number C005012</u> (Bldg. 573 near 12th & C Sts) consisting of: Nilfisk, Model No. GS-80, with a primary and secondary HPA filters. The HEPA filter is 99.9% efficient for collection of all particles whose mean diameter is equal to or greater than 0.3 microns.

Conditions for units with permit numbers: C005009, C005010, and C005012-

- 1. The HEPA filters shall meet UL 585 and UL 900 class 2 requirements.
- 2. This air filtration unit shall be operated and maintained in strict accord with those recommendations of the manufacturer.
- 3. This unit may, at the discretion of the owner/operator, be used on any asbestos project in the District with proper 10-day notification consistent with 40 CFR_61. Proper notification is written and telephone communication a minimum of 10 dDistrict working days prior to actual placement of the unit at the new site.
- 4. During full containment projects, view ports shall be provided for inspection purposes. The view port dimensions shall be at least 18 inches square and the bottom of said port no less than3 to 4 feet from the floor level.

Viewing ports shall be sufficient in number to allow observation of all stripping and removal of asbestos containing materials, ACM.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77]

ULTRAVIOLET OXIDATION SYSTEM ADVANCED OXIDATION PROCESS (AOP) MODULE (Bldg 609), MDAQMD permit number C005090 consisting of: Perox-PureTM 120 kW system (also known as the Advanced Oxidation Process [AOP] Module), model 180S15A97, which uses UV lamps with a quartz sleeves in a lined aluminum chamber. Organics are to oxidized in the systemorganics. This unit includes hydrogen peroxide *Tank T-13 and related chemical injection pumps. This unit received flow from the ultra filtration process and discharges into the reverse osmosis system (Tank T-33).

Conditions for units with permit numbers: C005090-

 This unit shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer's/supplier specifications and/or sound engineering principles.

This unit is an integral part of the Industrial Wastewater Treatment and Recycling facility, Building 609 and shall operate concurrently with associated valid District permits B004496, C004497, C004498, and B004500, as applicable.

2. This unit shall treat the discharge from Low Purity Water Storage Tank T-15.

- 3. All ultraviolet lamps shall be properly serviced and maintained to provide adequate wastewater light exposure. The number of ultraviolet lamps in operation and the chemical oxidizer injection rates may be adjusted to provide optimum oxidation to reduce organic concentrations in the wastewater.
- 4. The owner/operator shall maintain current and on- site for five (5) years a log of the following information, which shall be provided to District, state, or federal personnel upon request:
 - a.- Date of ultraviolet lamp removal and replacement-;
 - b. Date and amount of chemical oxidizer provided by vendor; and
 - c. Quarterly wastewater VOC concentrations (system inlet and outlet).

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77]

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REGENERATIVE THERMAL OXIDIZER, MDAQMD permit number C008397 (BLDG)dg. 634):

Four hydrophobic zeolite rotor collectors (three cycle), an 11 MMBtu/hr Kinemax Crossfire duct heater (concentrator regenerator at 350 degree Fahrenheit), and an oxidizer chamber with two Macon Kinemax low NO_x natural gas burners (6.5 MMBtu/hr total, nominal oxidation chamber temperature 1500 degrees Fahrenheit) equipped with structured ceramic thermal recovery media.

Conditions for unit with permit number: C008397

- This equipment shall be operated in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
- This equipment shall be operated and maintained in strict accordance with the recommendations of its manufacturer or supplier and/or sound engineering principles.
- 3. The exhaust from the spray booths and curing ovens with valid District permits S008392, S008393, S008394, S008395, and S008396 shall be ducted to this device.
- 4. This equipment (S008392, S008393, S008394, S008395, and S008396 and C008397) combined with (S009622 and C009623) and (S009969 and C009968) (entire Paint and Undercoat Facility Emissions Cap) shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations.
- 5. This equipment shall operate with a control efficiency of 95 percent (capture times destruction), comparing total VOC release in the booths and ovens and actual VOC emissions exhausted to the atmosphere from this device. Compliance with this condition shall be demonstrated on an annual basis with the concentrator inlet and oxidizer outlet VOC source test data (in conjunction with initial capture efficiency source test results).
- 6. The owner/operator (o/o) shall conduct annual compliance tests at the concentrator inlet and oxidizer outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete concentrator cycles), in accordance with the MDAQMD's Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A, or 25B, with USEPA Test Method 18, or CARB mMethod 422 used to determine exempt compound concentrations. Test results shall be submitted annually

to the District not later than six (6) weeks prior to the expiration date of this permit. MDAQMD permit number C008397.

DUST COLLECTOR, MDAQMD permit number C008808 consisting of:

Donaldon Cartridge Dust Collector

Model No. DFT 4-48, Manufactured by Torit, Inc.

Rated at 27,500 cfm

Contains 48 pleated cartridge filters – 13.84" diameter $\times \underline{x}$ 25" long, each with a 254 square feet filter area

50 hp fan and motor

hopper discharge valve

Air to Cloth ratio of 2.3:1.0

Conditions for unit with permit number: C008808-

- 1. The owner/operator (o/o) shall operate/maintain this equipment is strict accordance with the recommendations of the manufacturer and/or sound engineering practices.
- 2. This dust collector shall be operated concurrent with the Abrasive Blast Booth in Building 629 operating under valid District permit <u>number A008793</u>.
- 3. The o/o shall conduct a minimum program of inspection and maintenance on this equipment have a continuing program of maintenance/inspections in accord with manufacturer's recommendations and specifications. This program shall include regular visible emissions observations, inspections of all associated equipment including the filters and their retaining system, and filter pressure differential measurements.
- 4. The o/o shall log all applicable items referenced in condition 3. The log shall also include filter replacements, repairs, and non-scheduled maintenance information. This log shall be maintained current, on site for a minimum of five (5) years and provided to District, state or federal personnel on request. The owner/operator shall maintain current and on- site for five (5) years a log of the following information, which shall be provided to District, state, or federal personnel upon request:
 - a. -Quarterly dust collector stack observation date and result (using USEPA Method 22, and USEPA Method 9 if necessary);
 - b. -Quarterly cartridge and cartridge suspension system inspection date and results;
 - c. Date of cartridge replacement; and
 - d. Date and nature of any system repairs.
- 5. The o/o shall maintain on-site an inventory of replacement filters on sitecartridges at all times to help ensure compliance with these conditions or the system shall be

equipped with sensors that monitor the integrity of the eartridges and automatically shut down if the sensors indicate that the cartridge performance is compromised.

- 6. The o/o shall install and maintain a device which measures the pressure differential across the filters if one has not been provided with this unit. This system shall be equipped with sensors that monitor the integrity of cartridges. The system automatically shutdowns if the sensors indicate that the cartridge performance is compromised.
- The o/o shall comply with District Rule 430, Breakdown Provisions with regard to
 equipment malfunctions, which result in excess emissions.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

<u>DUST COLLECTORS, MDAQMD permit numbers C009132 and C009133</u> consisting of:

A Torit DFT 4-192 cartridge dust collector, with 192 pleated cellulose substrate with nylon membrane surface treatment 254 square foot cartridge filters totaling 48,768 square feet of filter area and a 200 hp blower producing 113,000 cfm of flow (for an air to cloth ratio of 2.3:1). This dust collector serves the Super Blast Booth Number 1 [Number 2 for C009133], elevator and abrasive separator (500 cfm from elevator and abrasive separator) under permit A009130 [A009131 for C009133].

Conditions for units with permit numbers: C009132 and C009133-

- 1. The owner/operator (o/o) shall maintain this dust collector in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which the produce the minimum emissions of air contaminants.
- 2. This dust collector shall operate concurrently with the Super Blast Booth Number 1 (A009130) for C009132 or Super Blast Booth Number 2 (A009131) for C009133.
- 3. The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The o/o shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State or Federal personnel upon request:
 - a. Monthly Quarterly dust collector stack observation date and result (using USEPA Method 22, and USEPA Method 9 if necessary);
 - b. Quarterly cartridge suspension system inspection date and results;

- c. Date of cartridge replacements; and-
- d. Date and nature of any system repairs.
- 4. This dust collector shall discharge no more than 0.0028 pounds per hour of PM₁₀ at a control efficiency of 99.999 percent at the operating conditions given in the above description (BACT). This equipment does not require a regularly scheduled emission compliance test. However, emission compliance testing may be required at the discretion of the District.
- 5. The o/o shall maintain on-site a minimum inventory of replacement cartridges that assures compliance with these conditions.
- This <u>unit system</u> shall be equipped with a pressure differential monitoring systemsensors that monitor the integrity of cartridges. The system automatically shutdowns if the sensors indicate that the cartridge performance is compromised. that will automatically shut the system down in the case of a broken cartridge or excessive pressure drop.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

C009623: RECUPERATIVE THERMAL OXIDIZER described as follows:

Munters Zeol System, Model Number IZS-3546-TH that includes: Concentrator (a continuously rotating rotor made of an absorptive medium, zeolite), which operates in three modes, adsorption, regeneration and cooling; and A Recuperative Thermal Oxidizer (TO), which utilizes one Eclipse RatioMatic Model RM500 Low NOx Burner, with a maximum heat input of 3.2 MMBtu/hr of natural gas, and the combustion chamber is heated to approximately 1375 degrees F.

Recuperative Thermal Oxidizer Permit to Operate Conditions:

 This equipment shall be operated in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.

[This condition incorporates application details for enforceability purposes.]

2. This equipment shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.

[This condition improves enforceability by incorporating good operational practices.]

3. The exhaust from the spray booth with valid District permit S009622 shall be ducted to this device.

[This condition ensures that the VOC emissions are destroyed.]

4. This equipment (S009622 and C009623) combined with emissions from S008392, S008393, S008394, S008395, S008396 and C008397, S009969, and C009968 (entire Paint and Undercoat Facility Emissions Cap) shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations.

[This condition verifies the netting calculation and establishes the PTE for the device.]

5. This equipment shall operate with a control efficiency of 95 percent (capture times destruction), comparing total VOC release in the booth and actual VOC emissions exhausted to the atmosphere from this device. Compliance with this condition shall be demonstrated on an annual basis with the Recuperative Thermal Oxidizer inlet and outlet VOC source test data (in conjunction with initial capture efficiency source test results).

[This condition verifies BACT for this process.]

6. The owner/operator (o/o) shall conduct annual compliance tests at the Recuperative Thermal Oxidizer inlet and outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete system cycles), in accordance with the MDAQMD's Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A, or 25B, with USEPA Test Method 18, or CARB method 422 used to determine exempt compound concentrations. Test results shall be submitted annually to the District not later than six (6) weeks prior to the expiration date of this permit MDAQMD permit number C009623. [This condition verifies BACT for this process.]

7. The o/o shall conduct an initial compliance test (as described in the USEPA technical document "Guidelines for Determining Capture Efficiency," (1/9/1995)) to establish capture efficiency in accordance with the MDAQMD's Compliance Test Procedural Manual. This test shall be performed within 60 days of initial operation of the control device. [This condition verifies BACT for this process.]

C009968: RECENERATIVE THERMAL OXIDIZER described as follows:

The new APCS will be Thermal Oxidizer (Bldg 634) consisting of: a Munters Zeol System, Model Number IZS-2946-TH. This system includes:

—A concentrator (a continuously rotating rotor made of an absorptive medium, zeolite), which operates in three modes: adsorption, regeneration, and cooling.

A Thermal Oxidizer (TO), utilizes one 2.0 million British thermal units per hour (MMBtu/hr) burner. This natural gas-fired Eclipse WX200 Burner will be set and limited to fire at a rate of 1.3 MMBtu/hr, heating the combustion chamber to approximately 1400°F. The TO will have is equipped with a stack height of 20 feet and a diameter of 16 inches. The exhaust temperature is 1,400°F with a maximum exhaust flow rate of 1,000 standard cubic feet per minute (scfm).

- This equipment shall be operated in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below. [This condition incorporates application details for enforceability purposes.]
- This equipment shall be operated and maintained in strict accord with the
 recommendations of its manufacturer or supplier and/or sound engineering principles.

 [This condition improves enforceability by incorporating good operational
 practices.]
- 3. The exhaust from the spray booth, and curing oven operating with valid District permit S009969 shall be ducted to this device. *[This condition ensures that the VOC emissions are destroyed.]*
- 4. This equipment (S009969, C009968) combined with emissions from S008392, S008393, S008394, S008395, S008396, C008397, S009622, and C009623 (entire

Paint and Undercoat Facility Emissions Cap) shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations. [This condition verifies the netting calculation and establishes the PTE for the device.]

- 5. This equipment shall operate with a control efficiency of 95 percent (capture times destruction), comparing total VOC release in the booth and actual VOC emissions exhausted to the atmosphere from this device. Compliance with this condition shall be demonstrated on an annual basis with the Recuperative-Thermal Oxidizer inlet and outlet VOC source test data (in conjunction with initial capture efficiency source test results). [This condition verifies BACT for this process.]
- 6. The owner/operator (o/o) shall conduct annual compliance tests at the Recuperative Thermal Oxidizer inlet and outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete system cycles), in accordance with the MDAQMD Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A₂ or 25B, with USEPA Test Method 18₂ or CARB mMethod 422 used to determine exempt compound concentrations. Test results shall be submitted annually to the District not later than six (6) weeks prior to the expiration date-of-this permit MDAQMD Permit C009968. [This condition verifies BACT for this process.]
- 7. The o/o shall conduct an initial compliance test (as described in the USEPA technical document, Guidelines for Determining Capture Efficiency, (1/9/1995)) to establish capture efficiency in accordance with the MDAQMD Compliance Test Procedural Manual. This test shall be performed within 60 days of initial operation of the control device. [This condition verifies BACT for this process.]
 - 87. This equipment shall only be fired on utility grade natural gas. [This condition verifies BACT for this process.]

DUST COLLECTORS, MDAQMD permit numbers C010219 consisting of:

Filter House for Internal Blast Equipment, including a Sunspan Systems Inc. Model SSC-9-XLC-SOC, Dust Collector with a flow rate of 4500 cfm, inlet velocity of 3800 lfm, and outlet velocity of 3300 lfm. Device contains 9 mounted in 3-rows of 3 High inlet cartridge filters with a total surface area of 2682 sq ft. Filter media is 80:20 blend of

pleated cellulose and polyester fiber. Air to Cloth ratio is 1.68:10. Fan motor is 10 hp.

Conditions for unit with permit number: C010219

- —1. This equipment shall be installed, operated, and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants.
- —2. Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
- —3. This dust collector shall be functioning at all times that the Abrasive Blasting equipment covered under Ppermit number A004412 is in operation.
- —4. The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The owner/operator shall maintain current and on- site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request:
- a. Quarterly dust collector stack observation date and result (-using USEPA mMethod 22 and USEPA mMethod 9 if necessary,
- b. Quarterly cartridge and cartridge suspension system inspection date and results, and
- c. dDate of cartridge replacement, d. date and nature of any system repairs.
- —5. The o/o shall maintain an inventory of filter cartridges on- site at all times which will ensure compliance.
- —6. An annual compliance/certification test of this unit for particulate and PM₁₀ is not required. However, the Owner/Operator shall conduct such testing upon District request and shall be in accordance with the District's "Compliance Test Procedural Manual."

DUST COLLECTOR, MDAQMD permit number C010410, consisting of: Building 566, Donaldon Cartridge Dust Collector, Model No. DFT4-256, manufactured by Torit, Inc, rated at 126,500 cfm, containing 256 filters, mounted in 4 rows of 64, comprised of cellulose substrate w/nylon membrane surface treatment, each with a 254 square feet area. Dust collector powered by a 200 hp fan and motor. Inlet and outlet velocity is 3,500 fpm. Collector has an Air to Cloth ratio of 1.9:1.0, and Dust Control efficiency of 99.999%.

Conditions for unit with permit number: C010410

- 1. The owner/operator (o/o) shall maintain this dust collector in strict accordance with the recommendations of the manufacturer/supplier and/or sound engineering practices.
- This system shall be equipped with sensors that monitor the integrity of the cartridges.
 The system shall automatically shutdown if the sensors indicate that the cartridge performance is compromised.
- 3. This dust collector shall be operated concurrent with the Abrasive Blast Booth in Building 566 operating under valid District permit number A005113.
- 4. The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The o/o shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request:
 - a. Quarterly dust collector stack observation date and result (using EPA method 22, and EPA Method 9 if necessary);
 - b. Quarterly cartridge and cartridge suspension system inspection date and results;
 - c. Date of cartridge replacement; and
- d. Date and nature of any system repairs.
- **D. SOLVENT VAPOR DEGREASER**, described as follows:

SOLVENT VAPOR DEGREASER, MDAQMD permit number D005319, consisting of: Building. 573, Small Arms Area; Forward Technology Industries, Model No. A1S-402024; Immersion sump tank volume: 140 gal; Boil tank volume: 30 – 40 gal.; Freeboard height: 30 in, width 28 in; Solvents: Isopropanol (IPA); IPA/cyclohexane mixture and acetone.

Conditions for unit with permit number: D005319-

- 1. This <u>∀vapor</u> degreaser shall only use isopropanol (IPA), IPA / cyclohexane azeotrope mixture, or acetone. District approval must be obtained before changing solvents.
- 2. The tank shall be equipped with a tight fitting cover.
- 3. The tank cover shall be closed at all times when the tank is not in use.
- 4. The tank must have a Freeboard Height of at least thirty (30) inches while the item(s) are submerged. The Freeboard Height is the distance from the top of the liquid to the top of the tank.

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- 5. Parts shall be added or removed from the tank in a manner so as to prevent splashing.
- 6. Parts being removed from the tank must appear visually dry.
- 7. The hoist speed must be slow enough to prevent solvent vapors from being pushed and/or pulled out of the tank. The hoist speed must not exceed 30 feet per minute and any new or replacement hoist must not exceed 11.2 feet per minute.
- 8. An operator's log must be maintained which contains, as a minimum, the type of solvent in each tank, and date and amount of solvent added. The log shall be maintained on-site for at least five (5) years and made available to District, state, or federal personnel upon request.
- 8-9 The degreaser shall only be operated and maintained in strict accord with <u>District Rule 1104 and</u> the manufacturer's/supplier's recommendations and/or sound engineering principles.
- 910. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted above.

The technical submittal is an integral part of this permit and <u>there</u> are specific limitations to the operation of this system unless specifically exempted hereunder.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)] [Rule 1104 - Organic Solvent Degreasing Operations; Version in SIP = Current, 40 CFR 52.220(c)(207)(i)(D)(2) - 04/30/96 61 FR 18962, effective 11/30/94]

E. EMERGENCY INTERNAL COMBUSTION ENGINES, described as follows:

E003845 DIESEL IC ENGINE, EMERGENCY ELECTRICITY GENERATOR, NW of BUILDING. 580; Onan 350 kW(e), Model No. 350DFCC3986OF, SN A910368253, powered by Cummins 3 cyl, 535 bhp diesel engine, Model No. NTA-855-G3, SN unknown.

E004391 DIESEL IC ENGINE, EMERGENCY GENERATOR, Bldg. 573, Area 12.

E004392 DIESEL IC ENGINE, EMERGENCY ELECTRICITY GENERATOR, BUILDINGLDG. 625; Generator powered by Caterpillar Model 3406-D1, 8 cyl, 375 bhp @1800 rpm, diesel engine,

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SN 2WB02941.

- DIESEL IC ENGINE, EMERGENCY GENERATOR, (BLDG. 609) Generator powered by Caterpillar Model 3508, Serial No 23Z05672, 8 cyl, 1020 bhp, direct injected, turbocharged, and aftercooled diesel engine, using 37.9 gal/hr of fuel and generating 500kW(e).
 - E005003 DIESEL IC ENGINE, EMERGENCY GENERATOR, (BLDG. 406 NEAR 16th & C STREETS) Power Systems unit, 375kW, driven by Cummins 6 cyl direct injected, turbo-charged, 600 bhp @ 1800 rpm diesel engine, Model No. KTA19-62, SN 31136347. USMC # 306534.
- E005016 DIESEL IC ENGINE, EMERGENCY AIR COMPRESSOR (#1), HP5, BUILDING, 574; Skid mounted.
- E005017 DIESEL IC ENGINE, EMERGENCY AIR COMPRESSOR (#2), BLDG. 574, HP5, Skid mounted.
- E009529 DIESEL IC ENGINE, EMERGENCY GENERATOR (BLDG. 558), Year of Manufacture __ 1991.

<u>PERMIT CONDITIONS</u>: (for the above diesel fired emergency generators and air compressors)

- This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles, which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.
- 2. Engine may operate in response to notification of impending rotating outage if the area utility has ordered rotating outages in the area where the engine is located or expects to order such outages at a particular time, the engine is located in the area subject to the rotating outage, the engine is operated no more than 30 minutes prior to the forecasted outage, and the engine is shut down immediately after the utility advises that the outage is no longer imminent or in effect.
 - 32. This unit shall only be fired on ultra-low sulfur diesel fuel, whose sulfur concentration is less than or equal to 0.0015% (15) on a weight per weight basis per CARB Diesel or equivalent requirements.
 - 43. A non-resettable four-digit (9,999) hour timer shall be installed and maintained on this

unit to indicate elapsed engine operating time.

- <u>54</u>. This unit shall be limited to use for emergency power, defined as in response to a fire or when commercially available power has been interrupted. In addition, this unit shall be operated no more than 20 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 20 hours per year limit. This condition does not apply to E005016 or E005017.
- 65. The owner/operator (o/o) shall maintain a operations log for this unit current and onsite, either at the engine location or at a on-site location, for a minimum of five (5) years, and for another year where it can be made available to the District staff within 5 working days from the District's request, and this log shall be provided to District, state, and federal personnel upon request. The log shall include, at a minimum, the information specified below:
- ____a. Date of each use and duration of each use (in hours);
 - -___b. Reason for use (testing & maintenance, emergency, required emission testing);
 - _—c. Calendar year operation in terms of fuel consumption (in gallons) and total hours; and-
 - __-d. _Fuel sulfur concentration (the o/o may use the supplier's certification of sulfur content if it is maintained as part of this log).
- 76. This <u>unit_genset</u> is subject to the requirements of the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines (Title17 CCR 93115). In the event of conflict between these conditions and the ATCM, the requirements of the ATCM shall govern. (STATE ENFORCEABLE ONLY")

Permit Condition for E005016 and E005017

This unit shall be limited to use for emergency power, defined as in response to a fire or when commercially available power has been interrupted, or when boiler control air pressure is not otherwise available due to repair or maintenance of electrically-driven compressors. In addition, this unit shall be operated no more than 20 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 20 hours per year limit.

E005337 PROPANE IC ENGINE, EMERGENCY GENERATOR, (BLDG. S-579 WELL #4)

E005338 PROPANE IC ENGINE, EMERGENCY GENERATOR, BLDG, S-600

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E008109 PROPANE IC ENGINE, EMERGENCY GENERATOR, BLDG. 484

E008110 PROPANE IC ENGINE, EMERGENCY GENERATOR, BLDG. S487

E008334 NATURAL GAS IC ENGINE, EMERGENCY GENERATOR, BLDG. 610, Venting through a Miratech Model EQ 701-12-C1 and MEC 2001 catalytic converter and air/fuel ratio controller.

PERMIT CONDITIONS: (for the above propane/natural gas fired emergency generators)

- 1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
- 2. This equipment shall be installed, operated, and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles, which produce the minimum emissions of contaminants.
- 3. This unit shall only be fired on propane (note that E008334 fires natural gas) fuel.
- 4. A non-resettable four-digit (9,999) hour timer shall be installed and maintained on this unit to indicate elapsed engine operating time.
- 5. The owner/operator (o/o) shall maintain a operations log for this unit current and onsite, either at the engine location or at a on-site location, for a minimum of five (5) years, and for another year where it can be made available to the District staff within 5 working days from the District's request, and this log shall be provided to District, state, and federal personnel upon request. The log shall include, at a minimum, the information specified below:
 - _a. Date of each use and duration of each use (in hours);
- b. Reason for use (testing & maintenance, emergency, required emission testing);
 - . Calendar year operation in terms of fuel consumption (in gallons) and total hours;
 - d. Fuel sulfur concentration (the o/o may use the supplier's certification of sulfur content if it is maintained as part of this log).
- 6. This unit shall be limited to use for emergency power, defined as in response to a fire or when commercially available power has been interrupted. In addition, this unit shall be operated no more than 100 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward

the 100 hour per year limit.

The following condition applies to E008334 NATURAL GAS IC ENGINE, EMERGENCY GENERATOR

7. This unit shall emit no more than the following BACT limits, which are all expressed in grams per brake horsepower hour:

NOx = 6.9

CO - 8.5

PM10 = 0.38

VOCs = 1.0 and Non-methane hydrocarbons of 0.3.

S. PAINT SPRAY BOOTHS, described as follows:

<u>PAINT SPRAY BOOTH, MDAQMD permit number S002872</u> (Bldg. 573, Area 18; North Bay 3) consisting of: Binks Model No. TF-644-T-LH with oven as follows:

This oven is used to dry freshly coated tactical vehicles/equipment. The oven is heated using 402 °F hot water @ 250 psig. The oven is 35'l x 21'w x 19'h. Heat exchangers with the hot water transmitted by heating plant No.5 are about 1680 sq ft of surface area in the oven. Ancillary to this is oven No. 2, which is described as a Benco Products, Inc. model CPD-12F-CS. The oven is steel with galvanized wall panels, doors, and roof. The doors on either end of the oven allow for equipment entering and/or leaving. The oven is equipped with a temperature controller and a dial thermometer. Air is circulated by means of a 15,000 ACFM blower powered by a 15 hp electric motor.

Volume of Booth: $14,400 \text{ cu. F}_{1}^{1}$, (20 w x 40 l x 18 h)

Air Flow Rate: 35,800 ACFM, 15 hp Motors, 2 @ 7.5 hp each

Pressure Drop Range: 0.25" — 1.0 2.5" W.C. 3" Dry Filter material: Polyester Fiber @ 2.0" thick

USMC Account No.: 389381

<u>PAINT SPRAY BOOTH, MDAQMD permit number S002873</u> (Bldg. 573, Area 18 North, Bay 2) consisting of: Binks Model No. TF-644-T-LH.

This oven is used to dry freshly coated tactical vehicles/equipment. The oven is heated using 402 °F hot water @ 250 psig. Heat exchangers with the hot water transmitted by Heating Plant No.5 are about 1680 sq ft of surface area in the oven.

Ancillary to this is oven No. 2, which is described as a Benco Products, Inc. model CPD-12F-CS

Volume of Booth: 14,400 eu. Fft³., (20'w x 40'l x 18'h)

Air Flow Rate: 35,800 ACFM, Motors, 2 @ 7.5 hp each

Pressure Drop Range: 0.25" – 1.02.5" W.C.

The oven is 35 ft by 21 ft by 19 ft high. The oven is steel with galvanized wall panels, doors and roof. The doors on either end of the oven allow for equipment entering and/or leaving.

The oven is equipped with a temperature controller and a dial thermometer. Air is circulated by means of a 15,000 ACFM blower powered by a 15 hp electric motor. USMC Account No.: 389380

Conditions for units with permit numbers: S002872, and S002873.

- 1. For purposes of this permit the term "Organic Solvent" is defined to mean volatile organic portion of all paints, lacquers, stains, preservatives, diluents, thinners, reducers, cleaners, etc., used to prepare an item for coating, coat the item, and for post cleaning of the item and all equipment used in the cleaning and coating activities.
- The total amount of photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 7.9 lb/hr and 39.6 lb/day.
- 3. The total amount of non-photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 81 lb/hr and 600 lb/day.
- 4.A daily solvent usage log shall be maintained for each permit unit with the uses and/or releases of organic solvents. This log shall contain, as minimum, the date, hours operated, material and amounts used on a daily basis. Additionally, the log must contain the pressure drop across the air emission control device. Note: The daily log information provides a basis for the Toxic Emissions Inventory required by AB2588 (STATE-ENFORCEABLE, ONLY).
- 5. A combined daily VOC emission report for these permits shall be prepared at least once a month. The logs and reports shall be maintained on site for at least five (5) years and made available to District, state or federal personnel upon request.
- 6. This equipment shall only be operated/maintained in strict accord with manufacturer's/supplier's recommendations and/or sound engineering principles.

NOTE: Currently isocyanate emissions are not regulated. However, isocyanates, along with over 500 other compounds, are listed under AB2588 "Toxics Hot Spots Program". Most users of these compounds are required to file a Toxic Emissions Inventory. Furthermore, many users will have to do a Risk Assessment. Based upon the Risk Assessment you may be required to control the emissions of the listed compounds. [Rule 204 — Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(e)(39)(ii)(B) = 11/09/78 = 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

FINAL COAT BOOTH, MDAQMD permit number S002876 consisting of: BUILDING.

634

Dimensions: 18'h x 60'w x 70'l booth, TECD601870

Intake filters: 112, 20" x 20"

Exhaust filters: Two stage exhaust filtration (112 20" x 20" filter pads and 112 bag filters)

Total Air Flow Rate: 60,000 cfm

Conditions for unit with permit number: \$002876.

- 1. This equipment (and related application equipment) shall be operated in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
- This equipment (and related application equipment) shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.
- 3. Only High Volume Low Pressure (HVLP) spray guns, hand held Aerosol Coating Products, or Hand Application Methods shall be used in the spray booth unless prior written approval is obtain from the District.
- 4. Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 1.5 inches WC.
- 5. The pressure drop across the spray booth discharge filters shall be taken and recorded in the operational log each day the booth is in operation.
- 6. The owner/operator (o/o) shall maintain current and on-site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to District, State or Federal personnel upon request and shall include, at a minimum, the following information:
 - a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning, cleanup or other).
 - VOC content of each type of coating and solvent in pounds per gallon or grams per liter.
 - c. Non-photochemically reactive content of each type of coating and solvent.
 - d. The method of application and type of substrate for each use.
 - e. Total VOC emissions in pounds per calendar day.
 - a. Total non-photochemically reactive solvent emissions in pounds per calendar day.
 - 1. Discharge filter pressure drop.
- The total amount of VOC released to the atmosphere from this booth is limited to 39.6 lbs per calendar day.
- 8. The total amount of non-photochemically reactive solvents (as defined in Rule 102) released to the atmosphere from this booth is limited to 600 lbs per calendar day.

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PAINT SPRAY BOOTH, MDAQMD permit number S004558 consisting of: BUILDING.

573, Area 18; Booth #1, Golden West, Model No. 2060 (modified).

Dimensions: 18'h x 20'w x 60'l Intake filters: 64, 20" x 20" x 2

Exhaust filters: 72, 20"x20", Air Technologies Inc., high efficiency

Total Air Flow Rate: 36,000 cfm; 23,000 cfm to APC device (C004561) and 13,000 cfm

recirculated back to the booth by two 18" variable frequency drive fans.

Ancillary to this is oven Number 1, which is described as a Benco Products, Inc. model CPD-12F-CS.

This oven is used to dry freshly coated tactical vehicles/ equipment. The oven is heated using 402 °F hot water @ 250 psig. Heat exchangers with the hot water transmitted by

Heating Plant No. 5, are about 1680 sq ft of surface area in the oven. The oven is 35 ft by 21 ft and 19 ft high. The oven is steel with galvanized wall panels, doors and roof. The oven has doors at either end to allow for equipment entering and/or leaving.

The oven is equipped with a temperature controller and a dial thermometer. Air is circulated by means of a 15,000 ACFM blower powered by a 15 hp electric motor.

Conditions for units with permit numbers: S004558.

- Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit issued unless otherwise noted below.
- This equipment shall only be operated/maintained in strict accord with manufacturers/supplier's recommendations and sound engineering principles.
- 4. This spray booth shall not be operated unless it is vented to the operating APCS covered by District permit C004561.
- 5. This spray booth shall be equipped with a gauge to measure the static pressure differential across the three stage high efficiency exhaust filters. In operation, the pressure differential shall not exceed 2.5 inches of water.
- 6. The spray booth shall have an interlock that does not allow painting unless the APCS, covered by District permit C004561, is fully operational.
- 7. If the emergency bypass sequence is activated, the event shall be reported to the District in accordance with District Rule 430.

BASE COAT BOOTH (NO. 1, BLDG 634); MDAQMD PERMIT # S008392:

One 18' high byx 30' wide byx 60' long booth, TECD301860DT, with 108 - 20" x 20" intake filters, two stage exhaust filtration (108 - 20" x 20" filter pads and 108 bag filters), with 57,000 cfm of air flow.

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Conditions for unit with permit number: S008392

- 1. This equipment (and related application equipment) shall be operated in compliance with all data and specification submitted with the application under which this permit is issued unless otherwise noted below.
- 2. This equipment (and related application equipment) shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.
- 3. Only High Volume Low Pressure (HVLP) spray guns, hand held Aerosol Coating Products, or Hand Application Methods shall be used in this booth unless prior written approval is obtained from the District.
- Coating or solvent use shall not occur within this booth without the booth being vented to the air pollution control system under valid District permit C008397.
- 5. Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 1.5 inches WC.
- 6. The pressure drop across the discharge filters shall be taken and recorded in the operational log each day the booth is in operation.
- 7. The owner/operator (o/o) shall maintain current and on site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to the District, State or Federal personnel upon request and shall include, at a minimum, the following information:
 - a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning and cleanup or other).
 - b. VOC content of each type of coating and solvent in pounds per gallon or grams—per liter.
 - c. The method of application and type of substrate for each use.
 - d. Total VOC emissions in pounds per calendar day.
 - e. Discharge filter pressure drop.

MDAQMD PERMIT # S008393; BASE COAT BOOTH (NO. 4, BLDG. 634); WITH CURING OVEN; INCLUDING:

One 16' high byx 20' wide byx 45' long booth, TECD201860PDT, with 9 - 20" x 20" intake filters and two stage exhaust filtration (9 - 20" x 20" exhaust filter pads and bag filters), with total air flow of 32,000 cfm. One 120 degrees Fahrenheit (°F) curing oven, 16' high byx 20' wide bxy 45' long, TECD, heated by 2 MMBtu/hr natural gas heater, with 750 cfm of exhaust, 4800 cfm of exhaust purge and 57,600 cfm of circulation air.

MDAQMD PERMIT # S008394; BASE COAT BOOTH (NO. 8, BLDG. 634) WITH CURING OVEN: INCLUDING:

One 12' high by \underline{x} 20' wide by \underline{x} 35' long booth, TECD201235PSB, with 40 - 20" x 20"

intake filters and two stage exhaust filtration (40 - 20" x 20" exhaust filter pads and bag filters), with total air flow of 24,000 cfm. One 120° degree-Fahrenheit curing oven, 12' high byx 16'- 6" wide byx 24' long, TECD, heated by 1 MMBtu/hr natural gas heater, with 360 cfm of exhaust, 1584 cfm of exhaust purge and 23,760 cfm of circulation air.

MDAQMD PERMIT # S008395; PRIME COAT BOOTH (NO. 10, BLDG. 634) WITH CURING OVEN; INCLUDING;

One 18' high byx 20' wide byx 60' long booth, TECD201860PDT, with 90 - 20" x 20" intake filters and two stage exhaust filtration (90 - 20" x 20" exhaust filter pads and bag filters), with total air flow of 39,000 cfm. One 120° degree Fahrenheit curing oven, 18' high byx 20' wide byx 45' long, TECD, heated by 2 MMBtu/hr natural gas heater, with 750 cfm of exhaust, 5400 cfm of exhaust purge and 64,800 cfm of circulation air.

MDAQMD PERMIT # S008396; PRIME COAT BOOTH (NO. 3, BLDG. 634) WITH CURING OVEN; INCLUDING;

One 12' high byx 20' wide byx 35' long booth, TECD201235PSB, with 40 - 20" x 20" intake filters and two stage exhaust filtration (40 - 20" x 20" exhaust filter pads and bag filters), with total air flow of 24,000 cfm. One 120° degree-F_ahrenheit-curing oven, 12' high byx 16'-6" wide byx 24' long, TECD, heated by 1 MMBtu/hr natural gas heater, with 350 cfm of exhaust, 1584 cfm of exhaust purge and 23,760 cfm of circulation air.

Conditions for unit with permit number: S008393, S008394, S008395, S008396

- 1. This equipment (and related application equipment) shall be operated in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
- 2. This equipment (and related application equipment) shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.
- 3. This paint drying oven shall only process items which have been coated within one of the spray booths with valid District permits S008392, S008393, S008394, S008395, or S008396.
- 4. Only High Volume Low Pressure (HVLP) spray guns, hand held Aerosol Coating Products, or Hand Application Methods shall be used in the spray booth unless prior written approval is obtain from the District.
- Coating or solvent use shall not occur within this booth, and curing shall not occur
 within this curing oven, without the enclosure being vented to the air pollution control
 system under valid District permit C008397.
- 6. Spray booth discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 1.5 inches WC.

- 7. The pressure drop across the spray booth discharge filters shall be taken and recorded in the operational log each day the booth is in operation.
- 8. The owner/operator (o/o) shall maintain current and on-site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to District, State or Federal personnel upon request and shall include, at a minimum, the following information:
 - a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning, cleanup or other).
 - b. VOC content of each type of coating and solvent in pounds per gallon or grams

 per liter.
 - c. The method of application and type of substrate for each use.
 - d. Total VOC emissions in pounds per calendar day.
 - e. Spray booth discharge filter pressure drop.

S009622: PAINT SPRAY BOOTH described as follows:

Spray Systems, Model TB-462018-P. Dimensions: 16' #—wide byx 46' #—long (inside dimensions). Intake filters will be Viledon Type R-1 (78 total; 20 inch x 20 inch x 1 inch). The exhaust filters will utilize two-stage particulate filters (78 total "Ultra Panel" for the first stage and 78 total "OSM-100" for the second stage, both 20 inch x 20 inch x 1 inch). The booth will be equipped with High Volume Low Pressure (HVLP) spray guns.

Spray Booth Permit to Operate Conditions:

- 1. Spray booth discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.075 to 0.2 inches WC.
 - [This condition incorporates application details for enforceability purposes.]
- 2. The pressure drop across the spray booth discharge filters shall be taken and recorded in the operational log each day the booth is in operation.

 [This condition improves enforceability by incorporating good operational practices.]
- 3. The owner/operator (o/o) shall maintain current and on site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to District, State or Federal personnel upon request and shall include, at a minimum, the following information (NOTE: The daily log information provides a basis for the Toxic Emission Inventory required by AB 2588.):
 - Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning, cleanup or other);

b. VOC content of each type of coating and solvent in pounds per gallon or grams per
liter; c. The method of application and type of substrate for each use;
d. Total VOC emissions in pounds per calendar day; and,
e. Spray booth discharge filter pressure drop.
[This condition is being added to specify record keeping procedures for verification and general
enforceability. Production records are required to establish compliance with the new emission limit.]
4. This equipment (and related application equipment) shall be operated in compliance with
all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[This condition incorporates application details for enforceability purposes.]
5. This equipment (and related application equipment) shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles.
[This condition improves enforceability by incorporating good operational practices.]
6. Only High Volume Low Pressure (HVLP) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in the spray booth unless prior written approval is obtain from the District.
[This condition makes an application commitment enforceable, increases the transfer efficiency of the coating operation, and ensures compliance with the 11xx series coating rules.]
7. Coating or solvent use shall not occur within this booth without the enclosure being vented to the air pollution control system under valid District permits C009623.
[This condition enforces the relationship between the VOC source and control device, and ensures compliance with the 11xx series coating rules.]
8. Operations within this booth shall comply with Rules 442, 1114, 1115, 1116 and 1118 as
appropriate. [This condition ensures compliance with the 11xx series coating rules.]
9. The o/o shall not use any motor vehicle or mobile equipment coating that contains
hexavalent chromium or cadmium (Section 17 CCR 93112 - Airborne Toxic Control Measure for
Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment
Coatings). Compliance with this condition shall be verified by the retention of MSDS sheets (or
equivalent documentation of chemical content) for every applicable coating used at the facility for five (5) years, and provision of said information to District, State or Federal personnel upon
request.
1 ioquest.

[This condition ensures compliance with toxic control measures and recordkeeping requirements for state and federal rules]

S009969: PAINT SPRAY BOOTH described as follows:

Bleeker Bros., Model STDT-12-10-30. The booth's inside dimensions are 10<u>°</u> feet-high byx 12<u>°</u> feet-wide byx 30<u>°</u> feet-long. Intake filters for the booth are AIRGUARD TRI-90 panel filters (20 inches by 20 inches). Exhaust filters utilize a three-stage particulate filter (i.e., Ultra Media blanket filter for the first stage, dimensions 42<u>°</u> inches wide byx 11<u>°</u> feet-long; Ultra prefilter for the second stage; and OSM-100 pocket filters for the third stage, both with dimensions of 20 inches by 20 inches by 1 inch). The booth is equipped with High Volume Low Pressure (HVLP) spray guns.

This equipment is equipped with an integral industrial Bleeker Bros., Model LTDC-12-10-20 oven. The ovens inside dimensions are 10<u>'_feet high byx</u> 12<u>'_feet wide byx</u> 30<u>'_feet long</u> heated by a 0.8 MMBtu/hr 408 OVENPAK burner to a temperature of 150°F. The exhaust blower will have a maximum flow rate of 2,000 scfm and a recirculation blower of 12,600 scfm. The oven's intake filters will be the AIRGUARD TRI-90 panel filters (20 inches by 20 inches).

Spray Booth Permit to Operate Conditions:

- Spray booth discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.075 to 0.2 inches WC. [This condition improves enforceability by incorporating good operational practices.]
- 2. The pressure drop across the spray booth discharge filters shall be taken and recorded in the operational log each day the booth is in operation. [This condition improves enforceability by incorporating good operational practices.]
- 3. The owner/operator (o/o) shall maintain current and on site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to District, State or Federal personnel upon request and shall include, at a minimum, the following information (NOTE: The daily log information provides a basis for the Toxic Emission Inventory required by AB 2588.):
 - a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning, cleanup or other);
 - b. VOC content of each type of coating and solvent in pounds per gallon or grams per liter:

- e. The method of application and type of substrate for each use;
- d. Total VOC emissions in pounds per calendar day; and,
- e. Spray booth discharge filter pressure drop.
- [This condition is being added to specify record keeping procedures for verification and general enforceability. Production records are required to establish compliance with the new emission limit.]
- 4. This equipment (and related application equipment) shall be operated in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below. [This condition incorporates application details for enforceability purposes.]
- This equipment (and related application equipment) shall be operated and maintained in strict accord with the recommendations of its manufacturer or supplier and/or sound engineering principles. [This condition improves enforceability by incorporating good operational practices.]
- 6. Only High Volume Low Pressure (HVLP) spray guns, hand held Aerosol Coating Products, or Hand Application Methods shall be used in the spray booth unless prior written approval is obtain from the District. [This condition makes an application commitment enforceable, increases the transfer efficiency of the coating operation, and ensures compliance with the 11xx series coating rules.]
- 7. Coating or solvent use shall not occur within this booth without the enclosure being vented to the air pollution control system under valid District permit, C009968. [This condition enforces the relationship between the VOC source and control device, and ensures compliance with the Hxx series coating rules and New Source Review Regulations, Reg XIII]
- 8. The o/o shall not use any motor vehicle or mobile equipment coating that contains hexavalent chromium or cadmium (Section 17 CCR 93112 Airborne Toxic Control Measure for Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings). Compliance with this condition shall be verified by the retention of MSDS sheets (or equivalent documentation of chemical content) for every applicable coating used at the facility for two (2) years, and provision of said information to District, State or Federal personnel upon request.
 - [This condition enforces the requirements that regulate Toxic Emission exposure and compliance with the 11xx series coating rules]
- 9. The o/o shall not use any motor vehicle or mobile equipment coating that contains hexavalent chromium or cadmium (Section 17 CCR 93112 Airborne Toxic Control

Measure for Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings). Compliance with this condition shall be verified by the retention of MSDS sheets (or equivalent documentation of chemical content) for every applicable coating used at the facility for five (5) years, and provision of said information to District, State or Federal personnel upon request.

[This condition ensures compliance with toxic control measures and recordkeeping requirements for state and federal rules]

10. This equipment shall only be fired on utility grade natural gas.

<u>Conditions for Permits S002872, S002873, S002876, S004558, S008392, S008393, S008394, S008395, S008396, S009622, and S009969</u>

- This equipment (and related application equipment) shall be operated in compliance with all data and specification submitted with the application under which this permit is issued unless otherwise noted below.
- This equipment (and related application equipment) shall be operated and
 maintained in strict accord with recommendations of its manufacturer or supplier
 and/or sound engineering principles.
- Only High Volume Low Pressure (HVLP) spray guns, hand-held Aerosol Coating
 Products, or Hand Application Methods shall be used in this booth unless prior
 written approval is obtained from the District.
- 4. Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 2.5 inches WC.
- 5. If the emergency bypass sequence is activated, the event shall be reported to the District in accordance with District Rule 430.

Conditions for Permits S002872 only

6. This spray booth is currently not required to vent through operating APCS covered by District permit C004561, therefore, the emissions from this equipment are limited to less than 25 lbs/per day [per MDAQMD rule 1303(A)(2)] verified through record keeping requirements pursuant to recordkeeping condition below.

Conditions for Permits S002873 and S004558 only This spray booth shall not be operated unless it is vented to the operating APCS covered by District permit number C004561. The pressure drop across the discharge filters shall be taken and recorded in the operational log each day the booth is in operation. Conditions for Permit S002876 only The total amount of VOC released to the atmosphere from this booth is limited to 39.6 lbs per calendar day. The total amount of non-VOC organic solvent released to the atmosphere from this booth is limited to 600 lbs per calendar day. Conditions for Permits S008392, S008393, S008394, S008395, and S008396 -only Coating or solvent use shall not occur within this booth without the booth being vented to the air pollution control system under valid District permit number C008397. Conditions for Permits S009622 only Coating or solvent use shall not occur within this booth without the booth being vented to the air pollution control system under valid District permit number C009623. Conditions for Permits S009969 only Coating or solvent use shall not occur within this booth without the booth being vented to the air pollution control system under valid District permit number This oven associated with this equipment shall only be fired on utility grade

Conditions for Permits S002872, S002876, S008392, S008393, S008394, S008395, S008396,

natural gas.

S009622, and S009969

The owner/operator (o/o) shall maintain current and on-site for a minimum of five (5) years a daily operational log (for each day the equipment is in operation). This daily log shall be provided to the District, state, or federal personnel upon request and shall include at a minimum, the following information:

- a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning and cleanup or other)-;
- VOC content of each type of coating and solvent in pounds per/gallon or grams per/liter;
- c. Non-VOC organic content of each type of coating and solvent;
- d. The method of application and type of substrate for each use;
- e. Total VOC emissions in pounds per calendar day;
- f. Total non-VOC organic solvent emissions in pounds per calendar day; and
- g. Discharge filter pressure drop.

T. TANKS TO INCLUDE DIP TANKS, ABOVEGROUND AND UNDERGROUND TANKS, AND WASTEWATER TANKS, described as follows:

DIP TANK, MDAQMD permit number T003092 consisting of: BUIldINg. 573, Small Arms Area; Tank # 11, magnesium phosphate/Cardobon D C4040; FIFO Manufacturing Co, type 304 stainless steel, 96"l x 30" x 28"d, with 18 gauge stainless steel cover.

Surface Area of Solvent: 20 sq. ft.

Volume of Solvent: 349 gallons (46.7 eu-ft³)

Agent: magnesium phosphate

Operating Temperature: Heated or Steam Operated: 190-200 degrees °F.

Vapor collection hood

<u>DIP TANK, MDAQMD permit number T003093</u> consisting of: BUIIdINg. 573, Small

Arms Area; Tank #14, Soluble Oil.

Surface Area of Solvent: 18 sq. ft. (3' x 6') Volume of Solvent: 470 gallons (3' x 6' x 3.5')

Agent: Soluble Oil, Boiling Point 700 degrees °F, Specific Gravity 0.93,

Autoiginition Temp. 340 degrees F, Flash Point 340 degrees F.

Operating Temperature: 200 degrees °F

Cover for Top

DIP TANK, MDAQMD permit number T003095 consisting of: BUIldINg. 573, Small

Arms Area; Tank # 16, Lubricating Oil. Surface Area of Solvent: 18 sq. ft. (3' x 6') Volume of Solvent: 470 gallons (3' x 6' x 3.5')

Agent: Soluble Oil, Lubricating Oil, General Purpose, Boiling Point 550

750 degrees_°F, Vapor Pressure, 0; Flash Point 290 degrees_°F.

Operating Temperature: Ambient

Cover for Top

DIP TANK, MDAQMD permit number T003374 (Bldg. 573, Area 11) consisting of:

Tank #5, Iron Phosphate.

Surface Area of Tank: 135 sq. ft. (9' x 15')

Volume of Tank: 3,282 gallons (9' x 15' x 3.25'), equals 438.75 eu. ft³.

Agent: Iron Phosphate, Steam Activated

Operating Temperature: 150 degrees °F

Vapor collection hood along the back of the tank and a fan that exhausts to the outside.

<u>DIP TANK, MDAQMD permit number T003376</u> (Bldg. 573, Small Arms Area) consisting of: Tank #2, Magnesium Phosphate.

Volume of Tank: 1080 gallons (100" x 48" x 52"), equals 144 eu. ft³.

Agent: Magnesium Phosphate, Steam Activated

Operating Temperature: 190 - 200 degrees <u>°</u>F

Vapor collection hood along the back of the tank and a fan that exhausts to the outside.

<u>DIP TANK, MDAQMD permit number T003377</u> (Bldg. 573, Small Arms Area) consisting

of: Tank #4, Chromic Acid.

Surface Area of Tank: 36 sq. ft. (3' x 12')

Volume of Tank: 942 gallons (3' x 12' x 3.5'), equals 126 cu. ft³.

Agent: Chromic Acid, Steam Activated Operating Temperature: 150 degrees °F

Vapor collection hood along the back of the tank and a fan that exhausts to the outside.

<u>DIP TANK, MDAQMD permit number T003378</u> (Bldg. 573, Small Arms Area) consisting of: Tank #10, Hydrochloric Acid; FIFO Manufacturing Co., type 304 stainless steel; 96"l x 30"w x 28"d: with two covers each measuring 96" Ll x 15" Ww.

Surface Area of Tank: 20 sq. ft.

Volume of Tank: 349 gallons (46.7 eu-ft³)

Agent: Hydrochloric Acid Operating Temperature: Ambient

Cover for Top

<u>DIP TANK, MDAQMD permit number T003379</u> (Bldg. 573, Small Arms Area) consisting of: Tank #12, Blackening Agent; FIFO Manufacturing Co., type 304 stainless steel; 96"l x 30'w x 28'd; with 18 gauge stainless steel cover.

Surface Area of Tank: 20 sq. ft.

Volume of Tank: 349 gallons (46.7 eu. Fft³.)

Agent: Blackening Agent

Steam Activated

Operating Temperature: 255 - 270 degrees °F

Vapor collection hood located along the back of the tank and a fan that exhausts to the outside.

DIP TANK, MDAQMD permit number T004671 (Bldg. 573, Area 11) consisting of:

Tank #8, Phosphoric Acid.

Surface Area of Tank: 45 sq. ft. (3' x 15')

Volume of Tank: 3,284 gallons (3' x 15' x 9', equals 439 eu. Fft³.)

Agent: Phosphoric Acid

Steam Activated

Steam Activated

Operating Temperature: 150 degrees F

Vapor collection hood located along the back of the tank and a fan that exhausts to the outside.

Conditions for units with permit numbers: T003092, T003093, T003095, T003374, T003376, T003377, T003378, T003379, T004671:

- The tank shall be equipped with a vapor collection hood located along the back of the tank except for permit <u>numbers</u> T003093, T003095, and T003378, which shall be equipped with a tight fitting cover that shall be closed at all times when the tank is not in use.
- 2. The vapor collection hood and fan shall be in operation when there is a chemical agent in the tank (except for permit <u>numbers</u> T003093, T003095, and T003378).
- 3. The tank must have a freeboard height of at least five (5) inches (for <u>permit numbers</u> T003377 and T003378 at least two (2) inches) while the items(s) are submerged. The freeboard height is the distance form the top of the liquid to the top of the tank.
- 4. Parts shall be added or removed from the tank in a manner to prevent splashing.
- 5. Parts being removed from the tank must not be dripping.
- 6. The hoist speed must be slow enough to prevent solvent vapors from being pushed and/or pulled out of the tank. The speed of the existing hoist must not exceed 30 feet per minute and any new or replacement hoist must not exceed 11.2 feet per minute.
- 7. An operator's log must be maintained which contains, as a minimum, the type of solvents in each tank, date and amount of solvent added, and a daily self-inspection checklist. The log shall be maintained on-site for at least five (5) years and made

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available to District, stateState, or federal personnel upon request.

8. For T003093 and T003095, the dip tank shall only be operated and maintained in strict accord with manufacturer's/supplier's recommendations and/or sound engineering principles.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

GASOLINE STORAGE TANK, MDAQMD permit number T003861 consisting of: BUILDING 573; Row E, Door 62, Area 16, 288 gal, 3' x 3' x 4'h, for testing facilities only.

Conditions for units with permit numbers: T003861.

[40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

- 1. This tank shall only be operated and maintained in strict accord with the manufacturer's and/or supplier's recommendations or sound engineering principles.
- 2. This tank must be equipped with a permanent submerged fill pipe.

 [Rule 204 Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) 11/09/78 43 FR 52237; Current Rule Version = 07/25/77]

INDUSTRIAL WASTE-WATER TANKS, MDAQMD permit number T003926, consisting of: BUIldINg. 609; Two aboveground Open top storage tanks (raw storage T-1 and raw storage tank T-2), SN 70-22 and 70-23 used for equalization of influent wastewater flows to the IWTP. Equipped with an oil skimmer which feeds Oily Water Storage Tank T-20 through a joint collection box. Raw Storage Tank T-1, 40' 1 x 9 ' h x 8' w 21,000 gallon capacity, Raw Storage Tank T-2 40' 1 x 9 ' h x 8' w 21,000 gallon capacity., 40' 1 x 9 ' h x 8' w.

INDUSTRIAL WASTE WATER TANK, MDAQMD permit number T003927, consisting of: BUILDING 609; 21,000 gal., Open top, 40' 1 x 9' h x 8' w.

-INDUSTRIAL WASTE WATER TANK, MDAQMD permit number T003929, consisting of: BUILDING 611; 21,000 gal., Open top, 40'1 x 9' h x 8' w.

PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANKS (Building. 611) consisting of: , MDAQMD permit number T005251, TANK NO. 679251 four temporary retention storage tanks (Tanks No. 679251, 6 79252, 679253, and 679254) handling surge flow from the Wet Well. consisting of: 39'8" 1 x 9'6" dia., Carbon steel 20,000 gallons. Retention Storage Tank No. 1, carbon steel cylinder 39'-8" by 9'6" D,

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20,000 gallon capacity, Retention Storage Tank No. 2, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity, Retention Storage Tank No. 3, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity, Retention Storage Tank No. 4, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity,

PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK, MDAQMD permit number T005252, TANK NO. 679252 consisting of: 39'8" 1 x 9'6" dia., Carbon steel 20,000 gallons.

PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK, MDAQMD permit number T005253, TANK NO. 679253 consisting of: 39'8" 1 x 9'6" dia., Carbon steel 20,000 gallons.

PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK, MDAQMD permit number T005254, TANK NO. 679254 consisting of: 39'8" l x 9'6" dia., Carbon steel 20,000 gallons.

Conditions for units with permit numbers: T003926, and T003927, T003929, T005251, T005252, T005253, T005254:

1. The o/o shall operate this equipment in strict accordance with the manufacturer's specifications and/or sound engineering principles.

Conditions for units with permit number: T003926

2 The o/o shall maintain a log of the records to verify proper disposal of the oil collected in Tank T-20 to Ecertified off-base handing facilities, including date of disposal and quantity disposed. These records shall be maintained on site for a minimum of five years.

Conditions for units with permit number: T005251

2. The o/o shall maintain a log of the records to verify proper disposalthat includes the date and volume of liquid disposed of -to Ccertified off-base handing facilities, including quantity from the retention tanks. These records shall be maintained on site for a minimum of five years.

Conditions for units with permit number: T003929

2. The o/o shall maintain a log of the records to verify proper disposal to Certified off-base handing facilities, including quantity. These records shall be maintained on site for a minimum of five years.

[Rule 204 - Permit Conditions; Version in SIP = CARB Ex. Order G-73, 40 CFR

52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

<u>UNDERGROUND STORAGE TANK, MDAQMD permit number T005118</u> consisting of: a Double walled FRP tank whose diameter is 10ft and length is 73.3 ft. The capacity of this tank is 40,000 gallons. The tank will hold diesel No. 2 fuel for back-up supply to Heating Plant No. 5. The tank will be designated 574 RT-1 by the Marine Corps/Barstow and will be west of Building 574 in the Yermo Annex.

Conditions for units with permit number: T005118:

- The o/o shall install, maintain and operate this unit This equipment shall be installed, operated, and maintained in strict accordance with those recommendations of the manufacturer/supplier, and/or sound engineering principles which produce minimum emissions of VOCscontaminants.
- 2. The <u>owner/operator (o/o)</u>-shall maintain a <u>daily operational</u> -log (for each day the <u>equipment is in operation</u>), which delineates the dates of filling, volume and additions and dates of maintenance and repair of this unit. The log shall be maintained current, on-site for 5 years and provided to District, <u>Cal EPA and USEPA State</u>, or <u>Federal personnel upon-on</u> request.

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 - 43 FR 52237; Current Rule Version = 07/25/77] [40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

PART IV STANDARD FEDERAL OPERATING PERMIT CONDITIONS

A. STANDARD CONDITIONS:

- If any portion of this Federal Operating Permit is found to be invalid by the final decision of a court of competent jurisdiction the remaining portion(s) of this Federal Operating Permit shall not be affected thereby.
 [40 CFR 70.6(a)(5); Rule 1203(D)(1)(f)(i)]
- 2. Owner/Operator shall comply with all condition(s) contained herein. Noncompliance with any condition(s) contained herein constitutes a violation of the Federal Clean Air Act and of MDAQMD Regulation XII and is grounds for enforcement action; termination, revocation and re-issuance, or modification of this Federal Operating Permit; and/or grounds for denial of a renewal of this Federal Operating Permit.

 [40 CFR 70.6(a)(6)(i); Rule 1203(D)(1)(f)(ii)]
- 3. It shall not be a defense in an enforcement action brought for violation(s) of condition(s) contained in this Federal Operating Permit that it would have been necessary to halt or reduce activity to maintain compliance with those condition(s).

 [40 CFR 70.6(a)(6)(ii); Rule 1203(D)(1)(f)(iii)]
- This Federal Operating Permit may be modified, revoked, reopened or terminated for cause.
 [40 CFR 70.6(a)(6)(iii); Rule 1203(D)(1)(f)(iv)]
- 5. The filing of an application for modification; a request for revocation and re-issuance; a request for termination; notifications of planned changes; or anticipated noncompliance with condition(s) does not stay the operation of any condition contained in this Federal Operating Permit.

 [40 CFR 70.6(a)(6)(iii); Rule 1203(D)(1)(f)(v)]
- 6. The issuance of this Federal Operating Permit does not convey any property rights of any sort nor does it convey any exclusive privilege.

 [40 CFR 70.6(a)(6)(iv); Rule 1203(D)(1)(f)(vi)]
- 7. Owner/Operator shall furnish to the MDAQMD, within a reasonable time as specified by the MDAQMD, any information that the MDAQMD may request in writing. [40 CFR 70.6(a)(6)(v); Rule 1203(D)(1)(f)(vii)]

Owner/Operator shall furnish to District, state or federal personnel, upon request, copies
of any records required to be kept pursuant to condition(s) of this Federal Operating
Permit.

[40 CFR 70.6(a)(6)(v); Rule 1203(D)(1)(f)(viii)]

9. Any records required to be generated and/or kept by any portion of this Federal Operating Permit shall be retained by the facility Owner/Operator for at least five (5) years from the date the records were created.

[40 CFR 70.6(a)(3)(ii)(B); Rule 1203(D)(1)(d)(ii)]

- Owner/Operator shall pay all applicable fees as specified in MDAQMD Regulation III, including those fees related to permits as set forth in Rules 301 and 312.
 [40 CFR 70.6(a)(7); Rule 1203(D)(1)(f)(ix)]
- 11. Owner/Operator shall not be required to revise this permit for approved economic incentives, marketable permits, emissions trading or other similar programs provided for in this permit.

[40 CFR 70.6(a)(8); Rule 1203(D)(1)(f)(x)]

- 12. Compliance with condition(s) contained in this Federal Operating Permit shall be deemed compliance with the Applicable Requirement underlying such condition(s). The District clarifies that "only" Applicable Requirements listed & identified elsewhere in this Title V Permit are covered by this Permit Shield and does not extend to any unlisted/unidentified conditions pursuant to the requirements of 40 CFR 70.6(f)(1)(i).

 [40 CFR 70.6(f)(1)(i); Rule 1203(G)(1)]
- 13. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to limit the emergency powers of USEPA as set forth in 42 U.S.C. §7603. [40 CFR 70.6(f)(3)(i); Rule 1203(G)(3)(a)]
- 14. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to limit liability for violations which occurred prior to the issuance of this Federal Operating Permit.

[40 CFR 70.6(f)(3)(ii); Rule 1203(G)(3)(b)]

- 15. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to alter any Applicable Requirement Contained in the Acid Rain Program.

 [40 CFR 70.6(f)(3)(iii); Rule 1203(G)(3)(c)]
- 16. The Permit Shield set forth above, in condition 12 of Part IV, shall not be

construed to limit the ability of USEPA or the MDAQMD to obtain information pursuant to other provisions of law including but not limited to 42 U.S.C. §7414. [40 CFR 70.6(f)(3)(iv); Rule 1203(G)(3)(d)]

- 17. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to apply to emissions trading pursuant to provisions contained in an applicable State Implementation Plan.
 [40 CFR 70.4(b)(12)(ii)(B); Rule 1203(G)(3)(e)]
- 18. The Permit Shield set forth above, in condition 12 of Part IV, shall not be construed to apply to changes made which are not expressly allowed by this Federal Operating Permit. [40 CFR 70.4(b)(14)(iii); Rule 1203(G)(3)(f)]
- 19. The Permit Shield set forth in Part IV, condition 12, shall not be construed to apply to changes made pursuant to the Significant Permit Modification provisions until such changes are included in this Federal Operating Permit.

 [40 CFR 70.5(a)(1)(ii), 70.7(e)(2)(vi); Rule 1203 (G)(3)(g)]
- 20. If Owner/Operator performs maintenance on, or services, repairs, or disposes of appliances, Owner/Operator shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. These requirements are Federally Enforceable through this Title V Permit.
 [40 CFR Part 82, Subpart F]
- 21. If Owner/Operator performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), Owner/Operator shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. These requirements are Federally Enforceable through this Title V Permit. [40 CFR Part 82, Subpart B]
- 22. Notwithstanding the testing requirements contained elsewhere in this Title V Permit, any credible evidence may be used to establish violations, including but not limited to; reference test methods, engineering calculations, indirect estimates of emissions, CEMS data, and parametric monitoring data. Data need not be required to be collected in a Title V permit in order to be considered credible.

 [Section 113(a) of the Clean Air Act]

PART V OPERATIONAL FLEXIBILITY

- A. ALTERNATIVE OPERATING SCENARIO(S):
- 1. COATING OPERATIONS SUBJECT TO NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR AEROSPACE MANUFACTURING AND REWORK OPERATIONS, 40 CFR PART 63, SUBPART GG
- 1a. If in the future the facility performs operations subject to the National Emissions Standard for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities, those operations must comply with the requirements of that regulation. This Title V Permit and applicable District Permits would require modification to allow Aerospace Manufacturing and Rework Facilities within the Mojave Desert Air Quality Management District jurisdiction.
 [40 CFR 63 Subpart GG]

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 43 FR 52237; Current Rule Version = 07/25/77] [MDAQMD Rule 1203]

1b. If the owner/operator performs coating activities that meet the applicability criteria of the above NESHAP, the facility must meet all applicable NESHAP requirements, including the applicable requirements of §63.743 (general standards), §63.745 (primer and topcoat application standard), §63.750 (test methods and procedures), §63.751 (monitoring requirements), §63.752 (recordkeeping requirements), §63.753 (reporting requirements), as well as the applicable requirements of the General Provisions (40 CFR Subpart A). The Owner/Operator must maintain a log to record the scenario under which it is operating.

[40 CFR 63 Subpart GG]

[Rule 204 - *Permit Conditions*; Version in SIP = CARB Ex. Order G-73, 40 CFR 52.220(c)(39)(ii)(B) - 11/09/78 43 FR 52237; Current Rule Version = 07/25/77]

B. OFF PERMIT CHANGES:

- I. Permittee may make a proposed change to equipment covered by this permit that is not expressly allowed or prohibited by this permit if:
 - A. Permittee has applied for and obtained all permits and approvals required by AVAQMD MDAQMD Regulation II and Regulation XIII unless the equipment involved in the change is exempt from obtaining such permits and approvals

pursuant to the provisions of Rule 219; and

- 1. The proposed change is not:
 - a. Subject to any requirements under Title IV of the Federal Clean Air Act; or [See 1203(E)(1)(c)(i)b.]
 - b. A modification under Title I of the Federal Clean Air Act; or
 - c. A modification subject to Regulation XIII; and [See 1203(E)(1)(c)(i) b.]
 - d. The change does not violate any Federal, State or Local requirement, including an applicable requirement; and -[See 1203(E)(1)(c)(i)b.]
 - e. The change does not result in the exceedance of the emissions allowable under this permit (whether expressed as an emissions rate or in terms of total emissions). [See 1203(E)(1)(c)(i)b.]

II. Procedure for "Off Permit" Changes

- A. If a proposed "Off Permit Change" qualifies under Part V, Section (B)(I)(A)(1) above, permittee shall implement the change as follows:
 - 1. Permittee shall apply for an Authority ∓to Construct permit pursuant to the provisions of Regulation II. [See 1203(E)(I)(c)(ii)a.]
 - 2. In addition to the information required pursuant to the provisions of Regulation II and Regulation XIII such application shall include:
 - a. A notification that this application is also an application for an "Off Permit" Change pursuant to this condition; and [See 1203(E)(1)(c)(ii)b.]
 - b. A list of any new Applicable Requirements which would apply as a result of the change; and [See 1203(E)(1)(c)(ii)b.]
 - c. A list of any existing Applicable Requirements which would cease to apply as a result of the change. [See 1203(E)(1)(c)(ii)b.]
 - 3. Permittee shall forward a copy of the application and notification to USEPA upon submitting it to the District. [See 1203(E)(1)(c)(ii)c.]
- B. Permittee may make the proposed change upon receipt from the District of the Authority to Construct Permit or thirty_seven (307) days after forwarding the copy of the notice and application to USEPA whichever occurs later. [See 1203(E)(1)(c)(ii)a. and e.]

- C. Permittee shall attach a copy of the Authority to Construct Permit and any subsequent Permit to Operate, which evidences the Off Permit Change to this Title V permit. [See 1203 (E)(1)(c)(ii)d.]
- D. Permittee shall include each Off-Permit Change made during the term of the permit in any renewal application submitted pursuant to Rule 1202(B)(3)(b). [See 1203(E)(1)(c)(ii)d.]

III. Other Requirements:

- A. The provisions of Rule 1205 Modifications do not apply to an Off Permit Change made pursuant to this condition.
- B. The provisions of Rule 1203(G) Permit Shield do not apply to an Off Permit Change made pursuant to this condition. [See 40 CFR 70.4(b)(i)(B)]

___[Rule 1203(E)(1)(c)]

PART VI CONVENTIONS, ABBREVIATIONS, DEFINITIONS

A. CONVENTIONS

The following referencing conventions are used in this federal operating permit:

40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS)

40 CFR Part 60, Appendix F, Quality Assurance Procedures

40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS)

40 CFR Part 61, Subpart M, National Emission Standards for Asbestos

40 CFR Part 63--National Emission Standards For Hazardous Air Pollutants For Affected Source Categories

40 CFR Part 72, Permits Regulation (Acid Rain Program)

40 CFR Part 73, Sulfur Dioxide Allowance System

40 CFR Part 75, Continuous Emission Monitoring

40 CFR Part 75, Subpart D, Missing Data Substitution Procedures

40 CFR Part 75, Appendix B, Quality Assurance and Quality Control Procedures

40 CFR Part 75, Appendix C, Missing Data Estimating Procedures

40 CFR Part 75, Appendix D, Optional SO₂ Emissions Data Protocol

40 CFR Part 75, Appendix F, Conversion Procedures

40 CFR Part 75, Appendix G, Determination of CO₂ Emissions

B. OTHER CONVENTIONS:

- 1. Unless otherwise noted, a "day" shall be considered a 24-hour period from midnight to midnight (i.e., calendar day).
- 2. The process unit identifications represent the District permit number designations. These numbers are not sequential. The use of District permit numbers provides continuity between the District and Federal Operating Permit systems.

C. <u>ABBREVIATIONS</u>

Abbreviations used in this permit are as follows:

AFCM	actual cubic feet per minute
AOP	Advanced Oxidation Process
CFR	Code of Federal Regulations
APCO	Air Pollution Control Officer
APCS	Air Pollution Control System
ATCM	Airborne Toxic Control Measure
ASTM	American Society for Testing and Materials
bhp	brake horsepower
Btu	British thermal units

CARB	California Air Resources Board
<u>cfm</u>	cubic feet per minute
CCR	California Code of Regulations
CFR	Code of Federal Regulations
CEMS	-continuous emissions monitoring system
CO	carbon monoxide
CO_2	carbon dioxide
District	Mojave Desert Air Quality Management District (formed July 1993)
EPA	U.S. Environmental Protection Agency
FID	flame ionization detector
<u>fpm</u>	feet per minute
FR	Federal Register
ft ³	cubic feet
<u>g</u> /L	grams per liter
MDAQMD	- Mojave Desert Air Quality Management District (formed July 1993)
— MD	Mojave Desert Air Quality Management District (formed July 1993)
SB	San Bernardino County APCD (1975 to formation of MDAQMD)
gr/dscf	grains per dry standard cubic foot
gpm	gallons per minute
gph	gallons per hour
hp	-horse power
HAP	hazardous air pollutant
HEPA	high efficiency particulate air
HVLP	high volume low pressure
<u>HP</u>	
<u>IC</u>	internal combustion
IPA	isopropanol
H&SC	California Health and Safety Code
lb	pounds
lb/gal	pounds per gallon
MCLB	Marine Corps Logistics Base
<u>MDAQMD</u>	Mojave Desert Air Quality Management District (formed July 1993)
<u>lb / hr</u>	-pounds per hour
— lb / MM Btu	pounds per million British thermal units
MM Btu	million British thermal units
MM-Btu/hr	million British thermal units per hour
MVAC	,motor vehicle air conditioner
NESHAP	National Emission Standards for Hazardous Air Pollutants
— MW	-Megawatt electrical power
— MW(e) net	net Megawatt electrical power
NH ₃	-ammonia
- NMOC	non-methane organic compounds
NO_x	oxides of nitrogen
$\frac{NO_2}{}$	nitrogen dioxide

	o/o	owner/operator
_	O ₂	- oxygen
	pH	pH (acidity measure of solution)
	PM	particulate matter
_	PM ₁₀	particulate matter less than 10 microns aerodynamic diameter
	ppm	parts per million
_	ppmvd	parts per million by volume <u>dry</u>
	psig	pounds per square inch gauge pressure
	PUC	Public Utilities Commission
_	QA	quality assurance
	rpm	revolutions per minute
	ŔO	reverse osmosis
Ξ	RVP	Reid vapor pressure
	SCAQMD	South Coast Air Quality Management District
	scfm	standard cubic feet per minute
_	sefh	standard cubic feet per hour
	SIC	Standard Industrial Classification
	SIP	State of California Implementation Plan
	SO _*	oxides of sulfur
_	SO_2	sulfur dioxide
_	TBD	to be determined
_	TPY	tons per year
	USMC	U.S. Marine Corps
_	U.S.C.	United States Code
_	UV	ultraviolet
_	VOC	volatile organic compound
_	tpy	tons per year
	TVP	true vapor pressure



Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
N/A	Part I. Introductory Information/I-1	N/A	Commanding Officer Marine Corps Logistics Base Attn: S Knutson Environmental Division Box 110170110196, Bldg 196 Barstow, CA 92311-5050	Change mailing address to refer to correct address.	MCLB Environmental building recently moved and during the move the PO Box also changed.
N/A	Part I. Introductory Information/I-1	N/A	Responsible Official: S.J. Thompson D.P. Ermer, Colonel USMC <u>Title:</u> Commanding Officer <u>Phone Number</u> : (760) 577-6555	Change responsible official name to new commanding officer.	Commanding Officer has recently changed so Title V renewal for 2010 needs to be updated accordingly.
N/A	Part I. Introductory Information/I-1	N/A	Alternate Responsible Official: Joseph L. Cook Title: Director, Environmental Division Phone Number: (760) 577-5931	Add alternate responsible official.	An additional name should be available for authorization to sign Title V documents when the commanding officer is not available.
N/A	II.A.23(a)/II-6	Any breakdown that results in emissions exceeding a technology-based emission limitation is reported to the District within one hour of such breakdown or within one hour of the time a person knew or reasonably should have known of the occurrence of such breakdown; and	Any breakdown that results in emissions exceeding a technology-based emission limitation is reported to the District within one hour of such breakdown or within one hour of the time a person knew or reasonably should have known the base air program manager is made aware of the occurrence of such breakdown.	Reword condition so that it is clearer that deviation be made within one hour of a responsible person being made aware of deviation.	Reporting deviations is part of responsibility of air program manager, and thus condition should be clear that the manager has one hour to notify district when aware of deviation.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
N/A	II.A.25/II-6 to II-8	Rule 442 VOC limits	Owner/Operator of this facility shall not discharge into the atmosphere from equipment in which organic solvents or materials containing organic solvents are used unless such emissions have been reduced by at least 85% or to the following: (a) VOCs from all VOC containing material in excess of 540 kilograms (1,190 pounds) per month per Facility; (a) Organic materials that come into contact with flame or are baked, heat cured, or heat polymerized are limited to 1.4 kilograms (3.1 pounds) per hour not to exceed 6.5 kilograms (14.3 pounds) per day. (b) Organic materials emitted into the atmosphere from the use of photo-chemically reactive solvents are limited to 3.6 kilograms (7.9 pounds) per hour, not to exceed 18 kilograms (39.6 pounds) per day, except as provided in Rule 442, subsection (a)(1). All organic materials emitted for a drying period of 12 hours following their application shall be included in this limit. (e b) Organic materials solvents emitted into the atmosphere from the use of non-photo-chemically reactive VOC solvents are limited to 3.6.8 kilograms (81 pounds) per hour not to exceed 272 kilograms (600 pounds) per hour not to exceed 272 kilograms (600 pounds) per hour not to condition shall not apply to the manufacture of organic solvents, or the transport or storage of organic solvents, or the transport or storage of materials (ed) The provisions of this rule shall not apply to: (1) The manufacture of organic solvents, or the transport or storage of materials containing organic solvents.	Rule 442 was modified in 2006 and SIP approved in 2007, Title V condition for 2010 renewal should be changed to represent current Rule.	Title V conditions should be consistent with rule.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
Number	аррисацоп:	Title V Permit Condition	(2) The use of equipment for which other requirements are specified by Rules 461, 462, 463, and 464-other Regulation IV rules or which are exempt from air pollution control requirements by said rules. (3) The spraying or other employment of organic solvents as insecticides, pesticides rodenticides or herbicides. (4) The use of water reducible materials, provided that: (a) the volatile content of such material is not photo-chemically reactive and consists of at least 80 percent water by volume, and (b) the organic solvent or any material containing organic solvent does not come into contact with flame. (5) The use of high solid materials, provided that: (a) the volatile content of such material is not photochemically reactive and does not exceed 20 percent by volume of said material, and (b) more than 50 percent by volume of such volatile material is evaporated before entering a chamber heated above ambient application temperature, and (c) the organic solvent or any material containing organic solvent does not come into contact with flame. (6) The use of ultra high solid materials, provided that: (a) the volatile content of such material is not photo-chemically reactive and does not exceed 5 percent by volume of said material, and (b) the organic solvent or any material containing organic solvent does not come into contact with flame. (7) The use of equipment or material containing organic solvent does not come into contact with flame. (7) The use of equipment or materials for which other requirements are specified in source specific rules of Regulation XI after the compliance dates specified in such source specifie rules. (84) The use of 1-1-1 Trichloroethane, methylene chloride and trichlorotrifluoroethane.	Comment	Justinication
			(5) Aerosol products		
N/A	II.A.28/II-11 to II-12	List of Rule 1113 Architectural Coating VOC limits	Update with Current Rule 1113	Rule 1113 VOC limits have been modified in 2003.	Title V renewal for 2010 needs to be updated to reflect modified MDAQMD rules.

Enclosure 3, Page 3

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
N/A	II.B.6(a)/II-21	Deviation reporting	For deviations involving emissions of air contaminants in excess of permit conditions including but not limited to those caused by a breakdown, prompt reporting shall be within one hour of the occurrence of the excess emission or within one hour of the time a person the base air program manager knew is made aware of or reasonably should have known of the excess emission. Documentation and other relevant evidence regarding the excess emission shall be submitted to the District within (60) days of the date the excess emission was reported to the District.	Reword condition so that it is clearer that deviation be made within one hour of a responsible person being made aware of deviation.	Reporting deviations is part of responsibility of air program manager, and thus condition should be clear that the manager has one hour to notify district when aware of deviation.
A003959	Description/III-2	ABRASIVE BLASTING SYSTEM, MDAQMD permit number A003959 (at Bldg. 569) consisting of: North Hardstand; Plastic Media Booth Stripping Technologies, Inc. Dimensions: 30'w x 60'l x 19'h 2 deck, 40" diameter, vibrating classifier for blast media Low profile loading hopper Pressure vessel, ASME coded, 11 cu. ft., with 60-degree cone bottom Tunable cyclone separator 2-50 ft., 1 1/4" hoses for blasting, 2 tungsten carbine nozzles Magnetic separator with electrical, piping, valving	ABRASIVE BLASTING SYSTEM, MDAQMD permit number A003959 (at Bldg. 569) consisting of: North Hardstand; Plastic Media Blast Booth Stripping Technologies, Inc. Dimensions: 30'w x 60'l x 19'h 2 deck, 40" diameter, vibrating classifier for blast media Reclaimer Systems (grating floor utilizing 6 screws) Abrasive storage Low profile loading hopper (100 cubic feet) Pressure vessel, ASME coded, 11 cu. ft., with 60-degree cone bottom Tunable cyclone Air wash abrasive separator, powered by elevator motor, Elevator Assembly, 2 hp motor, 2-50 ft., 1 1/4" hoses for blasting, 2 tungsten carbine 1/2"nozzles Magnetic separator with electrical, piping, valving	Change wording on Title V renewal for 2010 to match local permit dated January 12, 2009.	Equipment description on Title V should be consistent with local permit.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
A003959	III.A.A003959.1/ III-4	Abrasive blasting operations within any permanent building shall not discharge into the atmosphere emissions which have an opacity of 10% or greater.	Abrasive blasting operations within any permanent building shall not discharge into the atmosphere emissions which have an opacity of 10% 20% or greater.	Change wording on Title V permit renewal for 2010 to match local permit dated January 12, 2009 and be consistent with regulations.	Rule 401 limits visible emissions from sources to an equivalent of #1 on Ringelmann chart, which is the same as 20% opacity. Wording on local and Title V permit should match.
A004412	Description/III-2	ABRASIVE BLASTING CABINET, MDAQMD permit number A004412 consisting of: BUILDING 629; Wheelabrator 94 cu ft, w/vacuum and baghouse (#72AS28).	ABRASIVE BLASTING CABINET, MDAQMD permit number A004412 (Bldg 629) consisting of: BUILDING 629; by Sunspan Systems Inc. Cabinet dimensions are 9' w X 6' h X 12' l; includes: automated blast table 6' long, 25 hp centrifugal blast wheel, steel shot blasting media, with a maximum blasting rate of 23,000 lbs/hrsteel shot consumption rate of 125 lb/hrDevice also has an integral 1.5 hp screw conveyer. Wheelabrator 94 euft, w/vacuum and baghouse (#72AS28).	Title V renewal for 2010 and local permit dated May 2008 need to match actual conditions in field.	Device was modified and permit modification was requested. Title V renewal for 2010 should be updated to match changes on May 2008 local permit, however blasting rate needs to be changed on both permits. Per revised manufacturer specifications, the blasting rate was reevaluated to be based on the blasting material consumption instead of the blasting rate to more accurately describe the equipment operation.
A004412	III.A.A004412.3/ III-5	This equipment shall only be operated/maintained in strict accord with manufacturer's/ supplier's recommendations and sound engineering principles.	This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants.	Title V renewal for 2010 need to match actual conditions and local permit dated May 2008.	Device was revised and permit modification was obtained. Title V should be updated to match changes.
A004412	N/A /III-5	N/A	The abrasive blast enclosure (building) shall not be operated unless vented to properly functioning control device operating under valid District permit number C010219.	Title V renewal for 2010 and local permit dated May 2008 conditions need to match actual conditions.	Device was revised and permit modification was obtained. Title V should be updated to match changes.
A004412	N/A/ III-5	N/A	The abrasive blast enclosure (building) must be equipped with tight fitting seals around all openings, such as doors, windows, seems, etc., so as to prevent the escape of particulate material to the ambient air while in use.	Title V renewal for 2010 and local permit dated May 2008 conditions need to match actual conditions.	Device was revised and permit modification was obtained. Title V should be updated to match changes.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	.Justification
A004412	N/A/ III-5	N/A	This unit shall only use steel shot abrasive media	Title V renewal for 2010	Device was revised and permit
	IVA/ III-3		exempt from certification requirements of the California Air Resources Board (CARB).	and local permit dated May 2008 conditions need to match actual conditions.	modification was obtained. Title V should be updated to match changes.
A004412	N/A/ III-5	N/A	Abrasive blasting operations shall not discharge into the atmosphere emissions which have an opacity of-20 %or greater for more than three minutes in any one hour.	Title V renewal for 2010 should match local permit conditions dated May 2008, however local permit needs the opacity changed to 20% because Rule 401 limits visible emissions to 20% opacity.	Device was revised and permit modification was obtained. Title V should be updated to match changes. Local permit and Title V should be updated to match current regulations.
A004412	III.A.A004412. 27 / III-5	An operation log shall be maintained on-site for at least five (5) years and be made available to District, state or federal personnel on request. This log shall contain, as a minimum, the type and the amount of blasting material used in this cabinet.	An operation log shall be maintained on-site for at least five (5) years and be made available to District personnel on request. This log shall contain, as a minimum, the type and the amount and dates of use of blasting material used in this cabinet.	Title V renewal for 2010 should contain recordkeeping requirements for type, amount and dates of use. Local permit dated May 2008 needs to revise time frame to five years and change requirement for times used to date used.	Local permit and Title V should match
A005113	Description/III-2	ABRASIVE BLAST BOOTH, MDAQMD permit number A005113 (at Bldg. 566) consisting of: Booth 28' x 30' x 56'. This unit is equipped with a screener classifier for re-use of used blast materials and final filters to collect 100% of all particles greater than 1.0 micron.	ABRASIVE BLAST BOOTH, MDAQMD permit number A005113 (at Bldg. 566) consisting of: Booth 28' x 30' x 56'. This unit is equipped with a screener classifier for reuse of used blast materials and final filters to collect 100% of all particles greater than 1.0 micron This system vents through an air pollution control device operating under valid District Permit C010410.	Local permit was recently revised January 2009. Title V renewal for 2010 should be modified to match.	Permit condition on local permits and Title V should match.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
A005113	III.A.A005113.1/	This abrasive blast booth shall	This abrasive blast booth shall not be operated unless	Local permit was recently	Permit condition on local
71003113	III-6	not be operated unless it is vented to a functioning air pollution control device covered by a valid District permit, or which are an integral part of the equipment.	it is vented to a functioning air pollution control device eovered by a operating under valid District permit, or which are an integral part of the equipment. C010410.	revised January 2009. Title V renewal for 2010 should be modified to match.	permits and Title V should match.
A008793	Description/ III-2 to III-3	ABRASIVE BLAST BOOTH, MDAQMD permit number A008793 (at Building 629) consisting of: Blast room enclosure, 22'6" wide, 12' high, and 22'6# long, including a reclaimer system (grating floor type with three screws), Elevator assembly, Air Wash abrasive separator, and abrasive storage hopper (50 cu ft). Booth Ventilation and Abrasive Reclaimer vent to a Fabric Dust Collector air pollution control device, District permit number C008808. Capacity Equipment Description 100 Abrasive Blast supply compressed air 12.0 Floor reclaim system (4), 3-HP motor 2.0 Elevator assembly 0.3 Air Wash abrasive separator Motor (powered by the elevator's motor)	ABRASIVE BLAST BOOTH, (Bldg 629) consisting of: Blast room enclosure, 22'6" wide, 12' high, and 22'6" # long, including a reclaimer system (grating floor type with three screws), Elevator assembly, Air Wash abrasive separator, and abrasive storage hopper (50 cu ft³). Booth Ventilation and Abrasive Reclaimer vent to a Fabric Dust Collector air pollution control device, District permit number C008808. Capacity Equipment Description 100 Abrasive Blast supply compressed air 12.0 Floor reclaim system (4), 3-HP motor 2.0 Elevator assembly 0.3 Air Wash abrasive separator Motor (powered by the elevator's motor)	Title V renewal for 2010 description needs to change typos showing 22'6# long to 22.6". Local permit dated January 2009 also has typos such as 0.0 for air wash abrasive separator.	Permits have typos in descriptions that need changing to match actual conditions.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
A008793	III.A.A008793.2/ III-6	This system shall not discharge into the atmosphere emissions, which have an opacity greater than 10%. Compliance with this condition shall be determined through periodic (at least once per month) visual observations of the dust collector exhaust point during abrasive blast operations.	This system shall not discharge into the atmosphere emissions, which have an opacity greater than 10% 20%. Compliance with this condition shall be determined through periodic (at least once per month) visual observations of the dust collector exhaust point during abrasive blast operations.	Change wording on Title V renewal for 2010 to be consistent with regulations.	Rule 401 limits visible emissions from sources to an equivalent of #1 on Ringelmann chart which is the same as 20% opacity. Wording on local permit dated January 2009 and Title V permit renewal for 2010 should match.
A009130	Description/III-3	SUPER BLAST BOOTH ONE (NORTH OF BLDG 573), MDAQMD permit number A009130Consisting of: This abrasive blasting system is equipped with a floor grating reclaimer system, elevator assembly, air wash abrasive separator and 50 cubic foot abrasive storage hopper, and measures 30' W by 25' H by 48' L with 15 under floor screws. Capacity Equipment Description 40.0 Eight Underfloor Screw Motors (5 hp each) 2.0 Abrasive Bucket Elevator (2 hp) 150.0 Air Compressor (150 hp)	SUPER BLAST BOOTH ONE (Bldg 629 North Hardstand (North of Bldg 573) Bldg 565), Consisting of: This abrasive blasting system is equipped with a floor grating reclaimer system, elevator assembly, air wash abrasive separator and 50 cubic foot abrasive storage hopper, and measures 30' W by 25' H by 48' L with 15 under floor screws. Capacity Equipment Description 40.0 Eight Underfloor Screw Motors (5 hp each) 2.0 Abrasive Bucket Elevator (2 hp) 150.0 Air Compressor (150 hp)	Local permit dated January 2009 lists Bldg 629 North Hardstand and Title V dated March 2005 lists North of Bldg 573, building number is actually 565.	Building number has changed, equipment has not moved.

	Title V Section and Permit Condition/				
Permit Number	Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
A009131	Description/III-3	SUPER BLAST BOOTH TWO (NORTH OF BLDG 573), MDAQMD permit number A009131 Consisting of: This abrasive blasting system is equipped with a floor grating reclaimer system, elevator assembly, air wash abrasive separator and 50 cubic foot abrasive storage hopper, and measures 30' W by 25' H by 48' L with 15 under floor screws. Capacity Equipment Description 40.0 Eight Underfloor Screw Motors (5 hp each) 2.0 Abrasive Bucket Elevator (2 hp) 150.0 Air Compressor (150 hp)	SUPER BLAST BOOTH TWO (Bldg 629 North Hardstand (North of Bldg 573) Bldg 565), Consisting of: This abrasive blasting system is equipped with a floor grating reclaimer system, elevator assembly, air wash abrasive separator and 50 cubic foot abrasive storage hopper, and measures 30' W by 25' H by 48' L with 15 under floor screws. Capacity Equipment Description 40.0 Eight Underfloor Screw Motors (5 hp each) 2.0 Abrasive Bucket Elevator (2 hp) 150.0 Air Compressor (150 hp)	Local permit dated January 2009 lists Bldg 629 North Hardstand and Title V dated March 2005 lists North of Bldg 573, building number is actually 565.	Building number has changed, equipment has not moved.
B000935,	III.B.B000935.1;	This unit shall be operated and	This unit shall be operated and maintained in strict	Title V permit renewal	Manufacturer specification
B000936, B000937	B000936.1; B000937.1/ III-8 and III-9	maintained in strict accord with manufacturers and/or suppliers recommendations.	accord with manufacturers and/or suppliers recommendations or sound engineering principles.	for 2010 should be revised to allow for operation per sound engineering principles.	may not always be available thus it is recommended that permit allow operation per sound engineering principles.

	Title V Section				
	and Permit				
	Condition/				
Downit	Page No. in this				
Permit Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B000935,	III.B.B000935.3;	The owner/operator (o/o) shall	The owner/operator (o/o) shall not use No. 2 fuel oil	Revise Title V renewal	Regulations were recently
B000935, B000936,	B000936.3;	not use No. 2 fuel oil in this unit	in this unit whose sulfur content exceeds 0.05%	for 2010 condition to	revised to require sulfur
B000936, B000937	B000930.3, B000937.3/ III-8	whose sulfur content exceeds		match local permit dated	content of 0.0015%
D000937	and III-9	0.05% on a weight basis. The	0.0015% on a weight basis. The o/o may use the fuel supplier's analytical data, provided it is kept with the	January 2009.	Content of 0.0013%.
	and m-9	o/o may use the fuel supplier's	log. At the discretion of the District, samples of fuel	January 2009.	
		analytical data, provided it is	oil may be taken and submitted for analysis by ASTM		
		kept with the log. At the	methods D-2622-82, D-4294 or other method which		
		discretion of the District.	the District deems to be equivalent.		
		samples of fuel oil may be taken	the District deems to be equivalent.		
		and submitted for analysis by			
		ASTM methods D-2622-82, D-			
		4294 or other method which the			
		District deems to be equivalent.			
B000935,	III.B.B000935.6;	This equipment shall be tested	This equipment shall be tested to determine	Title V dated March 2005	Administrative change is
B000936,	B000936.6;	to determine compliance with	compliance with the above emission limits through	contains typo with	required to make condition
B000937	B000937.6/III-9	the above emission limits	emissions compliance testing, according to Rule 1157,	incomplete sentence.	clear and consistent with other
	and III-10	through emissions compliance	not less than once every twelve (12) months	Local permit conditions	permits.
		testing, according to Rule 1157,	annually. A tune-up may be performed in lieu of a	dated January 2009 often	
		not less than once every twelve	compliance test for years when the annual heat input	say "above" emission	
		(12) months. A tune-up may be	is less than 50,000 MMBTU. The boilers with valid	limits but the condition is	
		performed in lieu of a	District permit number s B000935, B000936, and	sometimes number 1 on	
		compliance test for years when	B000937 represent three identical linked boilers. If	local permit so emission	
		the annual heat input is less than	the annual heat input of these units combined is above	limits are actually below.	
		50,000 MMBTU. The boilers	50,000 MMBTU, then the emission limits presented	Also, clarified the	
		with valid District permits	above apply.	wording for when the	
		B000935, B000936, and		compliance testing should	
		B000937 represent three		be completed to make	
		identical linked boilers. If the		consistent with other	
		annual heat input of these units		permits that require	
		combined is above 50,000		source testing.	
		MMBTU, then the emission			
		limits presented above.			

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B000936; B000937	N/A/III-10	N/A	This equipment shall be operated in compliance with 40 CFR 60 Subpart Dc- Standards for Small Industrial-Commercial-Institutional Steam Generating Units.	Local permit dated January 2009 has condition to comply with Federal rule for 40 CFR 60 Subpart Dc. Title V renewal for 2010 needs to be revised to be consistent.	Title V needs to be updated to include same condition as local permit for consistency if constructed after 6/9/1989. If constructed before 6/9/1989 then condition should not be appearing on local permit
B003969, B004397, B004398, B004399, B004400, B004401, B004402, B004403	III.B.B003969.2 and 3 (III-12); III.B.B004397.3 and 4 (III-13); III.B.B004398.3 and 4; (III-13); III.B.B004399.3 and 4; (III-13); III.B.B004400.3 and 4 (III-13); III.B.B004401.3 and 4 (III-13); III.B.B004402.3 and 4 (III-13); III.B.B004403.3 and 4 (III-13); III.B.B004403.3 and 4 (III-13); III.B.B004403.3 and 4 (III-13); III.B.B004403.3 and 4 (III-13);	2. The o/o shall maintain a log of operations on this equipment, which contains at a minimum the following: a. Fuel consumed by the operating engines b. Date, time, and length of times of each engine's operation, and c. Brake hp of the engine developed at maximum during testing 3. The o/o shall keep a log the on-site for a minimum of five (5) years and provide it to the District, state or federal personnel on request	2 The o/o shall maintain log of operations for this equipment or spin test cell, current and on-site for a minimum of five years and this log shall be provided to the district, State, or Federal personnel upon request. This log shall include which contains, at a minimum, the following a) Fuel consumed by operating engines, b) date, time, and length of time of each engine's operation, and c) brake hp of engine developed at maximum during testing. 3 The o/o shall keep a log the on-site for a minimum of five (5) years and provide it to the District, state or federal personnel on request.	Local permits dated January 2009 requires that information is kept for a total of six years, and the limit for sulfur content is an operating limit which should be its own condition not part of recordkeeping requirements. Local permit and Title V renewal for 2010 wording should be reworded to be consistent.	The local permit is more stringent than Title V requirement and should be modified to match Title V since there is no requirement to store records for six years.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B003969, B004397, B004398, B004399, B004400, B004401, B004402, B004403	III.B.B003969.4 (III-12); III.B.B004397.5 (III-13); III.B.B004398.5 (III-13); III.B.B004499.5 (III-13); III.B.B004400.5 (III-13); III.B.B004401.5 (III-13); III.B.B004402.5 (III-13); III.B.B004403.5 (III-13); III.B.B004403.5 (III-13);	The engines tested are limited to using diesel fuel whose sulfur content does not exceed 0.05% on a weight per weight basis.	The engines tested are limited to diesel fuel whose sulfur content does not exceed 0.05% 0.0015% on a weight per weight basis.	Revise this condition so it is a separate condition on the local permits dated January 2009 instead of part of recordkeeping condition. Regulatory requirement changed so Title V renewal for 2010 needs to be modified to have limit of 0.0015% instead of 0.005% on a weight per weight basis.	Regulatory requirement changed so Title V needs to be modified to have limit of 0.0015% instead of 0.005% on a weight per weight basis.
B004401	Description/III-11	Dynamometer, MDAQMD permit number B004401 consisting of: BUILDING 573, Area 16; Unit No. 5, for testing diesel engines under no load, located in room approx. 10'1 x 14'w x 12'h.	Dynamometer, SPIN TEST CELL, MDAQMD permit number B004401 consisting of: BUILDING 573, Area 16; Unit No. 5, for testing diesel engines under no load, located in room approx. 10'l x 14'w x 12'h.	Local permit dated January 2009 states Spin Test Cell and Title V renewal for 2010 should be revised to match.	Local permit and Title V should match.
B004194	III.B.B004194.4/ III-14	Only High Volume Low Pressure (HVLP) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in this equipment unless prior written approval is obtained from the District.	Only High Pressure Low Volume Volume Low Pressure (HVLP HPLV) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in this equipment unless prior written approval is obtained from the District.	Permits incorrectly refer to HVLP instead of High Pressure Low Volume spray guns used in vehicle undercoating racks.	The local permit dated January 2009 and Title V renewal for 2010 should be revised to match actual conditions.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B004194	III.B.B004194.5/ III-14	Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 1.5" WC.	Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 1.5" 2.5" WC.	Based on conversations with MDAQMD the 1.5" upper limit was a typo that should be 2.5". This value was changed in local permit dated January 2009 and needs to be corrected in Title V to match.	Administrative typo corrected in local permit that needs to be corrected in Title V.
B004194	III.B.B004194.8/ III-14	The total amount of photo- chemically reactive solvents released to the atmosphere from this undercoating complex is limited to 39.6 lbs per calendar day.	The total amount of photo-chemically reactive VOC solvents released to the atmosphere from this undercoating complex is limited to 39.6 lbs per calendar day.	Rules were modified to use the terminology VOC instead of photo- chemically reactive, thus recommend changing wording in conditions.	Title V conditions should be consistent with rule.
B004753	Description/III-14 to III-15	VEHICLE UNDERCOATING RACK, MDAQMD permit number B004753 consisting of: BUILDING 203, NE Corner; 90' x 20' rack consisting of six (6) bays with undercoating on four (4) bays equipped with Mohawk Lifts and airless spray guns. Ashland Chemical Co. undercoating materials Tectyl 185 GW, Tectyl 2423 or equivalent.	VEHICLE UNDERCOATING RACK, MDAQMD permit number B004753 consisting of: BUILDING 203, NE Corner West Hardstand; 90' x 20' rack consisting of six (6) bays with undercoating on four (4) bays equipped with Mohawk Lifts and airless spray guns. Ashland Chemical Co. undercoating materials Tectyl 185 GW, Tectyl 2423 or equivalent.	Need to change location on Title V renewal for 2010 to be clearer and match local permit dated January 2009.	Description of location has changed, although equipment has not moved.
B004753	N/A/III-15	N/A	This equipment (and related application equipment) shall be operated in compliance with all data and specification submitted with the application under which this permit is issued unless otherwise noted below.	This condition appears on similar permits for other undercoating racks thus recommend adding to Title V Renewal for 2010 for consistency.	Title V conditions should be consistent among all similar equipment.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B004753	III.B.B004753.23/ III-15	A daily record shall be maintained of the VOC emissions from this source which contains but is not limited to the following: a. Manufacturer and brand name of undercoating used b. VOC limit (non-photochemically reactive) c. VOC limit (photochemically reactive) d. Quantity of coating used e. Total VOC emissions not photochemically reactive f. Total VOC emissions photochemically reactive g. Total VOC emissions	A daily record shall be maintained of the VOC emissions from this source which contains, for each day equipment is in operation but is not limited to, the following: a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning and cleanup or other). b. VOC limit (non-photochemically reactive) content of each type of coating and solvent in pound per gallon or grams per liter; c. VOC limit (photochemically reactive) The method of application and type of substrate for each use d. Quantity of coating used Total VOC emissions in pounds per calendar day	Recommend removing references to photochemically reactive versus non-photochemically reactive solvents to be consistent and make sure that recordkeeping conditions are similar for all similar operations and consistent with rules.	The local permit dated January 2009 should be revised and Title V permit renewal for 2010 conditions should match current rules which no longer refer to photochemically reactive versous non-photochemically reactive solvents. Conditions should be similar for similar sources.
B004753	III.B.B004753.45/ III-15	The total VOC emissions for this undercoating rack and the undercoating rack covered by District Permit B004753 (photochemically reactive and non photochemically reactive) shall not exceed 250 pounds/day.	The total VOC emissions for this undercoating rack and the undercoating rack covered by District Permit B004753-B004194 shall not exceed 250 pounds per day.	This condition is already for B004753. The combined emissions from B004753 and B004194 should not exceed 250 lbs/day.	Administrative change since incorrect permit reference in condition.
B004753	III.B.B004753. 56 / III-15	The total amount of photochemically reactive solvents released to the atmosphere from this undercoating complex is limited to 39.6 lbs per calendar day.	The total amount of photochemically reactive VOC solvents released to the atmosphere from this undercoating complex shall not exceed 39.6 lbs per calendar day.	Recommend removing references to photochemically reactive solvents to be consistent with regulations which only refer to VOC.	The local permit dated January 2009 should be revised and Title V permit renewal for 2010 conditions should match current rules which no longer refer to photochemically reactive versous nonphotochemically reactive solvents.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B004753	III.B.B004753.7/ III-15	N/A	Only High Pressure Low Volume (HPLV) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in this equipment unless prior written approval is obtained from the District.	Title V conditions should be similar for similar sources.	Title V conditions should be similar for similar sources.
B004496	Description and all conditions/III-16	See Title V Permit	Remove all conditions from Title V	The air stripper was placed off-line after a fire, caused by a failure in the thermal oxidizer burner controls that caused extreme temperatures in the fiberglass exhaust stack, subsequently causing it to catch on fire. This air stripper was safely shut down and is no longer operated. Treatment of dissolved organic contaminants (VOCS and SVOCs) in the wastewater was transferred to the UV/OX system. Once equipment is disposed of this permit for air stripper should be canceled.	The air stripper is no longer in operation. Once the equipment is disposed of, MCLB Barstow would like to cancel the permit and then remove from the Title V.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B004499	Description/III-16	OIL-WATER SEPARATOR, MDAQMD permit number B004499 consisting of: BUILDING 609; Great Lakes Environmental, Inc., Slant Rib Coalescing Separator I, Model SRC-75, with pumps, electrical, tanks, and other appurtenances (see Engineering Evaluation). Note: Much of the equipment ancillary to this unit is common to B004500, Oil-Water Separator II. B004499 and B004500 may function separately or simultaneously.	OIL-WATER SEPARATORS, MDAQMD permit number B004499 consisting of: BUILDING 609; Great Lakes Environmental, Inc., Slant Rib Coalescing Separator I and II, Model SRC-75, with pumps, electrical, tanks, and other appurtenances (see Engineering Evaluation). Note: Much of the equipment ancillary to this unitOil-Water Separator I is common to-B004500, Oil-Water Separator II. B004499 and B004500Oil-Water Separator I and Oil-Water Separator II may function separately or simultaneously. This unit receives flow from the Raw Storage Tanks (T-1) and (T-2), rejects oily discharge to Oily Water Storage Tanks (T-3 and T-20), and discharges into the ultra filtration system (tank T-30).	This change was requested by MCLB Barstow per a 14 January 2009 meeting that both permits B004499 and B004500 be combined into one permit since they each refer to the same model of oil-water separator (i.e., Oil-Water Separator No. 1 and No. 2).	Operation, model, and conditions for both separators are similar, so one permit referencing requirements would ease permit maintenance for unit.
B004499	III.B.B004499.1/ III-16	The engineering and design submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted above.	The engineering and design submittal is an integral part of this permit and are specific limitations to the operation of this system unless specifically exempted above below.	This is first condition on March 2005 Title V permit and June 2009 local permit, thus wording needs to be changed to reference conditions below.	Need to revise wording for clarity.
B004499	III.B.B004499.3/ III-17	The o/o shall maintain a current, on-site log for this equipment for a minimum of five (5) years and shall provide this log to the District, State, or Federal personnel upon request. The log shall include at least the following information: a. Monthly volume of liquid entering the oil-water separators (in gallons)	The o/o shall maintain a current, on-site log for this equipment for a minimum of five (5) years and shall provide this log to the District, State, or Federal personnel upon request. The log shall include at least the following information: a. Monthly volume of liquid entering the oil-water separators (in gallons) b. Date and Volume of any liquids disposed of to Certified off-base handling facilities from Tank T-12 (in gallons).	Title V March 2005 permit is missing recordkeeping requirement for storage of monthly volume of discharge. Waste-flows of discharges are infrequent. Individual flows are not normally monitored and may be mixed with other wastes in the storage tanks for final disposal off-site.	The Title V needs to be modified to be consistent with recordkeeping requirements on local permit revised in June 2009.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B004500	Description and Title V conditions/ III – 16 and III - 17	See local permit and Title V	Remove conditions and combine with OWS I.	Recommend removing permit and making equipment part of B004499.	Since Oil-Water Separator II is ancillary and same model as Oil-Water Separator I, it is recommended that B004500 be combined with B004499 for ease of permit maintenance
B008746	Description/III-17 and III-18	WASTEWATER TREATMENT PLANT/RECYCLING FACILITY, MDAQMD permit number B008746 consisting of: Listing of tanks, process equipment and pumps associated with IWTP operation	See Title V renewal application page III-43 and III-44 for complete description: Revisions should include WASTEWATER TREATMENT PLANT/RECYCLING FACILITY, (Bldg 609) MDAQMD permit number B008746 consisting of: T-1, Tank, 21,000 gal, w/oil skimmer, 16°0°. T-2, Tank, 21,000 gal, w/oil skimmer, 16°0°. T-12, Tank, Sludge HoldingOily Water, for disposal only, 3,500 gal, T-16, Tank, High Purity Water Storage, 12' h x 12' dia,, 10,000 gal, Grit Washer Separator Sand Filters, (2) Filter Press Carbon Units P-4A4B, Transfer oily sludge from oil/water separator #2 to T-20 at oil/water separator; pneumatic P-37, 0.8 hp, Supplies clean water from T-16 to earbon units for backwash P-54, 0.8 hp, Circulates cleaning water through stripper tower P-38, 1.2 hp, Pumps effluent from stripper to T-33 P-14, Transfer sludge to filter press at T-12, pneumatic Total Pump Capacity: 29.9-27.2hp	Local permit was recently modified in June 2009 to accurately reflect field the Title V description for 2010 renewal needs to be modified to reflect local permit.	Local permit was recently modified. Title V needs to incorporate changes.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
B008746	III.B.B008746.2/	A log of operating hours, time and date shall be maintained current, on-site for a minimum of five (5) years and provided to the District personnel on request.	A log of operating hours, when attended by an operator, time and date shall be maintained current, on-site for a minimum of five (5) years and provided to the District personnel on request.	Local permit was recently modified in June 2009 to accurately reflect field the Title V description in renewal for 2010 needs to be modified to reflect local permit.	Local permit was recently modified. Title V needs to incorporate changes.
B008890	Description/ III- 19	PAINT PYROLYSIS OVEN, MDAQMD permit number B008890 consisting of: Adjacent to building # 634, N. Hardstand, Steelman Industries, Model 666BA-C, 6' w x 6' d x 6' h; advanced burn-off (cleaning) with rear burners and top down heating, 305,000 Btu/hr primary burner @ 900 degree F; 470,000 Btu/hr afterburner @ 1,800 degrees F.	PAINT PYROLYSIS OVEN, MDAQMD permit number B008890 consisting of: Adjacent to building # 634, NW. Hardstand, Steelman Industries, Model 666BA-C, 6' w x 6' d x 6' h; advanced burn-off (cleaning) with rear burners and top down heating, 305,000 Btu/hr primary burner @ 900 degree F; 470,000 Btu/hr afterburner @ 1,800 degrees F.	Hardstand is at North west of facility. This hardstand is often called west Hardstand. Change location on Title V permit renewal for 2010 to be consistent with local permit dated January 2009.	Equipment did not move, but name of location is not consistent with local permit.
B008921	Description/III-19 to III-20	TRAY STRIPPER, MDAQMD permit number B008921 consisting of: BLDG 609, Shallow tray low profile, Model No. 2641, includes a 7.5 hp permeate pump and 7.5 hp blower.	TRAY STRIPPER-AERATION UNIT (Bldg 609) MDAQMD permit number B008921 consisting of (Bldg 609): Shallow tray low profile, Model No. 2641, with ancillary equipment. The unit receives flow from the reverse osmosis system and discharges into the High Purity Water Storage Tank T-16. 7.5 hp permeate pump 7.5 hp blower.	Change Title V permit renewal for 2010 to match local permit dated June 2009 and actual equipment in field.	Permit has been modified since Title V and thus changes need to be incorporated into Title V.
B008921	III.B.B008921.1 /III-20	This unit shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles.	The owner/operator (o/o) shall operate this equipment This unit shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier specifications and/or sound engineering principles.	Change Title V permit renewal for 2010 to match local permit dated June 2009 and actual equipment in field.	Permit has been modified since Title V and thus changes need to be incorporated into Title V.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	.Justification
B008921	III.B.B008921.2/	This unit is an integral part of	This unit is an integral part of the Industrial	Condition No. 2 on Title	Condition should be removed
	III-20	the Industrial Wastewater	Wastewater Treatment and Recycling facility,	V for March 2005	so that permit reflects actual
		Treatment and Recycling	Building 609 and shall operate concurrently with	requires the tray stripper	operation of equipment. None
		facility, Building 609 and shall	associated valid District permits B004496, C004497,	to be operated	of the listed permits in Title V
		operate concurrently with	C004498, and B004500, as applicable.	concurrently with permit	are associated with the
		associated valid District permits		numbers B004496,	operation of the Aeration unit.
		B004496, C004497, C004498,		C004497, C004498,	
		and B004500, as applicable.		B004499 and B004500.	
				B004496, C004497, and	
				C004498 are no longer in operation and B004500 is	
				and oil water separator.	
				The aeration of the	
				recycled industrial water	
				by this equipment is	
				primarily for minor water	
				quality improvement	
				(increasing dissolved	
				oxygen and infrequent	
				lowering of ph) and is not	
				directly linked with the	
				operation of the reverse	
				osmosis system in B008746. Thus there	
				should be no condition in	
				place to operate it	
				concurrently with any of	
				the listed permits.	
B008921	N/A/III-20	N/A	A log of operating hours, time and date shall be	Change Title V permit	Permit has been modified
			maintained current, on-site for a minimum of five	renewal for 2010 to	since Title V and thus changes
			(5) years and provided to the District personnel on	match local permit from	need to be incorporated into
			request.	June 2009 and actual	Title V.
				equipment in field.	

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C003245, C003247	III.C.C003245.3 and C003247.3/ III-21	The o/o shall conduct a minimum program of maintenance on this equipment. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District personnel upon request: a. Weekly dust collector stack observation date and result (using USEPA method 22 and USEPA method 9 if necessary, b. date of cartridge replacement, c. date and nature of any system repairs	The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, personnel upon request: a. Weekly Quarterly dust collector stack observation date and result (using USEPA method 22 and USEPA method 9 if necessary, b. Quarterly cartridge suspension system inspection date and results c. date of cartridge replacement, e.d.date and nature of any system repairs	California Air Resources Board Periodic Monitoring Recommendations for Baghouses with PTE between 25 to 300 TPY is quarterly. Thus request that visible emission inspection requirement be quarterly instead of weekly. Title V renewal for 2010 conditions need to be updated to represent local permit dated January 2009 which requires implementation of an inspection program along with maintenance program.	Visible emission inspections and dust collector inspection frequency should be consistent with CARB recommendations and the Title V conditions should be at least as stringent as the local permit.
C003245, C003247	III.C.C003245.5 and C003247.5/ III-21	The system shall be equipped with sensors that monitor the integrity of cartridges. The system shall be automatically shut down if the sensors indicate that the cartridge performance is compromised.	The system shall be equipped with sensors that monitor the integrity of cartridges. The system shall be automatically shuts-down if the sensors indicate that the cartridge performance is compromised.	Wording on Title V Renewal for 2010 should be changed to be clearer.	The control device will shutdown if the cartridges are compromised no action is required by facility thus wording should be changed to match actual conditions

Permit Number C003961	Title V Section and Permit Condition/ Page No. in this application: III.C.C003961.3/	Title V Permit Condition The o/o shall install and	Recommended Revision The o/o shall install and maintain a device, which	Comment The system automatically	Justification This monitor shouldn't be
233701	III-22	maintain a device, which measures the pressure differential across the filters if one is not provided with the unit.	measures the pressure differential across the filters if one is not provided with the unit.	shuts down when sensors mention in condition 2 show cartridge performance is compromised. The use of an additional monitor is redundant and shouldn't be needed. This is not a condition on other dust collector permits C003245 or C003247.	needed since system sensors shut down unit when cartridges are compromised. All dust collector permit conditions should be consistent, since all units are similar.

		Title V Section				
		and Permit				
		Condition/				
	Permit	Page No. in this				
	Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
	C003961	III.C.C003961.5/	The o/o shall conduct a	The o/o shall conduct a minimum program of	Equipment contains	Visible emission inspections
		III-22	minimum program of	inspection and maintenance on this equipment. The	cartridge filters not bags,	and dust collector inspection
			maintenance on this equipment.	owner/operator shall maintain current and on-site for	thus local permit wording	frequency should be consistent
			The owner/operator shall	five (5) years a log of the following information,	needs to be changed to	with CARB recommendations
			maintain current and on-site for	which shall be provided to District, State, or Federal	reference cartridges and	and the Title V conditions
			five (5) years a log of the	personnel upon request:	not bags. California Air Resources Board Periodic	should be at least as stringent
			following information, which	a. Monthly Quarterly baghouse dust collector stack		as the local permit. All dust
			shall be provided to District, State, or Federal personnel upon	observation date and result (using USEPA method 22	Monitoring Recommendations for	collector permit conditions should be consistent, since all
			request:	and USEPA method 9 if necessary, b. Monthly	Baghouses with PTE	units are similar.
			a. Monthly dust collector stack	Quarterly bag and bag cartridge suspension system	between 25 to 300 TPY is	units are similar.
			observation date and result	inspection date and results c. Monthly reading of baghouse (or cartridge) pressure drop, date, and	quarterly. Thus request	
			(using USEPA Method 22, and		that visible emission and	
			USEPA Method 9 if necessary)	value dc. date of bag cartridge replacement, de. date and nature of any system repairs	cartridge inspection	
			b. Monthly cartridge and	date and nature of any system repairs	requirement be quarterly	
			cartridge suspension system		instead of monthly. Title	
			inspection date and results		V renewal for 2010	
			c. Monthly reading of cartridge		conditions need to be	
			pressure drop, date, and value		updated to represent local	
			d. Date of cartridge replacement		permit dated January	
			e. Date and nature of any system		2009 which requires	
			repairs.		implementation of an	
					inspection program along	
					with maintenance	
					program and requires the	
					inspection of the	
					suspension system. The	
					requirement for pressure	
					drop reading should be	
					removed since system	
					automatically shutdowns	
					when cartridge	
					performance is	
					compromised and	
					condition does not appear	
					on other dust collector	
					permits C003245 or	
L					C003247.	

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Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C004497	Description and Title V conditions/III-22 to III-23	See local permit and Title V	Remove conditions	The thermal oxidizer was placed off-line after a fire, caused by a failure in the thermal oxidizer burner controls that caused extreme temperatures in the fiberglass exhaust stack, subsequently causing it to catch on fire. The thermal oxidizer was safely shut down and is no longer operated. Treatment of dissolved organic contaminants (VOCS and SVOCs) in the wastewater was transferred to the UV/OX system. Once equipment is disposed of this permit for thermal oxidizer should be canceled.	The thermal oxidizer is no longer in operation. Once the equipment is disposed of, MCLB Barstow would like to cancel the permit and then remove from the Title V.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C004498	Description and Title V conditions/III-23	See local permit and Title V	Remove conditions	The thermal oxidizer was placed off-line after a fire, caused by a failure in the thermal oxidizer burner controls that caused extreme temperatures in the fiberglass exhaust stack, subsequently causing it to catch on fire. The caustic scrubber is no longer operated. Treatment of dissolved organic contaminants (VOCS and SVOCs) in the wastewater was transferred to the UV/OX system. Once equipment is disposed of this permit for thermal oxidizer should be canceled.	The caustic scrubber is no longer in operation. Once the equipment is disposed of, MCLB Barstow would like to cancel the permit and then remove from the Title V.
C004561	III.C.C004561.2/ III-24	The exhaust from the paint booth covered by District permit S004558 shall be ducted to this APCS.	The exhaust from the paint booth covered by District permits: S002873 and S004558 shall be ducted to this APCS.	Title V March 2005 permit does not list all booths that are vented to APCS condition needs to be modified to include all applicable units.	Change wording on Title V renewal for 2010 to contain all applicable units and be consistent with local permit dated January 2009.
C004561	III.C.C004561.4/ III-24	This APCS shall operate with an overall capture efficiency of 90%.	This APCS shall operate with an overall eapture control efficiency of 90%, verified using FIDs before the inlet to the carbon bed and FIDs in the outlet to the atmosphere.	Local permit dated January 2009 wording is more accurate and clearer than Title V dated March 2005, 90% is overall control efficiency of unit, and is measured using FIDs.	Change wording on Title V renewal for 2010 to contain all applicable units and be consistent with local permit dated January 2009.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C004561	III.C.C004561.5/ III-24	The o/o shall maintain a current, on-site operational log for this device. This log shall be retained for five (5) years and shall be provided to District, State or Federal personnel upon request. The operational log shall include the following information at a minimum: a. Booths vented to the device;b. Daily usage of coating and solvent in gallons, VOC content of each material in pounds per gallon, and total VOC emissions in pounds, within booths vented to this device.c. At least hourly FID readings at the inlet to the carbon beds and the exhaust to the atmosphere; and,d. Net VOC emissions to the atmosphere (after all control devices) in pounds per day.	The o/o shall maintain a current, on-site operational log for this device. This log shall be retained for five (5) years and shall be provided to District, State or Federal personnel upon request. The operational log shall include the following information at a minimum: a. Booths vented to the device;b. Daily usage of coating and solvent in gallons, VOC content of each material in pounds per gallon, and total VOC emissions in pounds, within booths vented to this device.c. At least hourly FID readings at the inlet to the carbon beds and the exhaust to the atmosphere when booths being controlled are in operation; and,d. Net VOC emissions to the atmosphere (after all control devices) in pounds per day.	Hourly readings from FIDs shouldn't be necessary if the booths being controlled by the device are not in operation. Rule 1115 requires that capture efficiency be determined according to USEPA's technicaldocument, "Guidelines for Determining Capture Efficiency" (1/9/95) and control efficiency of the Control Device shall be determined according to USEPA Test Methods 25, 25A or 25B. Rule 1116 requires VOC Emissions be measured per EPA Reference Method 25, in combination with the methods prescribed in the Federal Register (55 FR 26865 of June 29, 1990) for determination of capture efficiency.	Recordkeeping and monitoring requirements should not be more stringent than regulatory requirements.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C005090	Description/III-26	ADVANCED OXIDATION PROCESS (AOP) MODULE, MDAQMD permit number C005090 consisting of: Perox-Pure™ 120 kW system, model 180S15A97, which uses UV lamp with a quartz sleeve in a lined aluminum chamber. Organics are oxidized in the system.	ADVANCED OXIDATION PROCESS (AOP) MODULE ULTRAVIOLET OXIDATION SYSTEM (Bldg 609) MDAQMD permit number C005090 consisting of: Perox-Pure TM 120 kW system (also known as the Advanced Oxidation Process (AOP) module), model 180S15A97, which uses UV lamps with a quartz sleeves in a lined aluminum chamber Organics are to oxidized in the system organics. This unit includes hydrogen peroxide tank T-13 and related chemical injection pumps. This unit received flow from the ultra filtration process and discharges into the reverse osmosis system (tank T-33).	Title V renewal for 2010 needs to be modified to account for recent changes to local permit dated June 2009.	Title V should be consistent with local permit modifications.
C005090	III.C.C005090.1/ III-26	This unit shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier.	This unit shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer's /supplier specifications and/or sound engineering principles	Title V renewal for 2010 needs to be modified to account for recent changes to local permit dated June 2009.	Title V should be consistent with local permit modifications.
C005090	III.C.C005090.2/ III-26	The unit is an integral part of the Industrial Wastewater Treatment and Recycling facility, and shall operate concurrently with permits B004496, C004497, C004498, and B004500, as applicable.	The unit is an integral part of the Industrial Wastewater Treatment and Recycling facility, and shall operate concurrently with permits B004496, C004497, C004498, and B004500, as applicable.	This condition is no longer on local permit dated June 2009. The UV-Oxidation process has replaced treatment by the air stripper, thermal oxidizer, and caustic scrubber for dissolved organic contaminants in the wastewater.	Title V renewal for 2010 should be consistent with local permit dated June 2009.
C005090	N/A/ III-26	N/A	This unit shall treat the discharge from Low Purity Water Storage Tank T-15.	Title V renewal for 2010 needs to be modified to account for recent changes to local permit dated June 2009.	Title V should be consistent with local permit modifications.

Permit	Title V Section and Permit Condition/ Page No. in this				V 155 11
Number	application:	Title V Permit Condition	Recommended Revision	Comment Title V renewal for 2010	Justification Title V should be consistent
C005090	N/A/III-26	N/A	All ultraviolet lamps shall be properly serviced and maintained to provide adequate wastewater light exposure. The number of ultraviolet lamps in operation and the chemical oxidizer injection rates may be adjusted to provide optimum oxidation to reduce organic concentrations in the wastewater.	Title V renewal for 2010 needs to be modified to account for recent changes to local permit dated June 2009.	Title V should be consistent with local permit modifications.
C005090	N/A/ III-26	N/A	The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, state, or federal personnel upon request: a. Date of ultraviolet lamp removal and replacement. b.Date and amount of chemical oxidizer provided by vendor; and c. Quarterly wastewater VOC concentrations (system inlet and outlet).	Title V renewal for 2010 needs to be modified to account for recent changes to local permit dated June 2009.	Title V should be consistent with local permit modifications.
C008397	III.C.C008397.4/ III-27	This equipment shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations.	This equipment (S008392, S008393, S008394, S008395, S008396, C008397) combined with (S009622 and C009623) and (S009969 and C009968) (entire Paint and Undercoat Facility Emissions Cap) shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations.	Wording on permit renewal for 2010 should be consistent with all permits in paint facility since emission limit is for complete paint and undercoat facility not just these booths.	Wording on this permit needs to be clearer to represent actual emission limit cap.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C008397	III.C.C008397.6/ III-27	The owner/operator (o/o) shall conduct annual compliance tests at the concentrator inlet and oxidizer outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete concentrator cycles), in accordance with the MDAQMD Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A or 25B, with USEPA Test Method 18 or CARB Method 422 used to determine exempt compound concentrations. Test results shall be submitted to the District no later than six (6) weeks prior to the expiration date of this permit.	The owner/operator (o/o) shall conduct annual compliance tests at the concentrator inlet and oxidizer outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete concentrator cycles), in accordance with the MDAQMD's Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A or 25B, with USEPA Test Method 18 or CARB Method 422 used to determine exempt compound concentrations. Test results shall be submitted annually to the District no later than six (6) weeks prior to the expiration date of this permit. MDAQMD permit C008397.	Source test results are due annually per local permit dated January 2009, and thus source test results are due six weeks prior to expiration of local permit and not six weeks prior to Title V expiration.	Need to change wording to be clear to represent annual submittal requirement, not due every five years (six weeks prior to Title V expiration).
C008808	III.C.C008808.3/ III-28	The o/o shall have a continuing program of maintenance/inspections in accord with manufacturer's recommendations and specifications. This program shall include regular visible emissions observations, inspections of all associated equipment including the filters and their retaining system, and filter pressure differential measurements.	The o/o shall have a continuing conduct a minimum program of maintanenance/inspections inspection and maintenance on this equipment in accord with manufacturer's recommendations and specifications. This program shall include regular visible emissions obserfations, inspections of all associated equipment including the filters and their retaining sytem, and filter pressure differential measurments.	The conditions for this equipment should be similar to other abrasive blasting units, thus recordkeeping requirements should be listed in condition 4.	Title V conditions for similar pieces of equipment should be consistent.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C008808	III.C.C008808.4/ III-28	The o/o shall log all applicable items referenced in condition 3. The log shall also include filter replacements, repairs, and nonscheduled maintenance information. This log shall be maintained current, on-site for a minimum of five (5) years and provided to District, state or federal personnel on request.	The o/o shall log all applicable items referenced in condition 3. The log shall also include filter replacements, repairs, and non-scheduled maintenance information. This log shall be maintained current, onsite for a minimum of five (5) years and provided to District, state or federal personnel on request. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request: a. Quarterly dust collector stack observation date and result (using USEPA method 22 and USEPA method 9 if necessary, b. Quarterly cartridge suspension system inspection date and results c. date of cartridge replacement, d. date and nature of any system repairs	California Air Resources Board Periodic Monitoring Recommendations for Baghouses with PTE between 25 to 300 TPY is quarterly. Thus request that inspection requirements be quarterly. The pressure differential measurement should not be required since unit shutdowns automatically when the integrity of the cartridge filters is compromised. Request that wording of conditions for abrasive blasting dust collectors be consistent for all similar equipment.It is recommended that this condition for Title V renewal for 2010 be revised to be similar to other permits for abrasive	Visible emission inspections and dust collector inspection frequency should be consistent with CARB recommendations and the Title V conditions should be the same for all similar equipment.
C008808	III.C.C008808.5/ III-28	The o/o shall maintain an inventory of replacement filters on-site at all times to help ensure compliance with these conditions or the system shall be equipped with sensors that monitor the integrity of the cartridges and automatically shut down if the sensors indicate that the cartridge performance is compromised.	The o/o shall maintain on-site an inventory of replacement filters on-site cartridges at all times to help ensure compliance with applicable rules of District Regulation IV these conditions or the system shall be equipped with sensors that monitor the integrity of the cartridges and automatically shut down if the sensors indicate that the cartridge performance is compromised.	blasting dust collectors. It is recommended that this condition for Title V renewal for 2010 be revised to be similar to other permits for abrasive blasting dust collectors. Condition for sensor system should be required as part of condition 6.	Title V conditions should be the same for all similar equipment.

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Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C008808	III.C.C008808.6/ III-29	The o/o shall install and maintain a device which measures the pressure differential across the filters if one has not been provided with this unit	The o/o shall install and maintain a device which measures the pressure differential across the filters if one has not been provided with this unit. This system shall be equipped with sensors that monitor the integrity of cartridges. The system shall be automatically shutdown if the sensors indicate that the cartridge performance is compromised.	It is recommended that this condition for Title V renewal for 2010 be revised to be similar to other permits for abrasive blasting dust collectors.	Title V conditions should be the same for all similar equipment.
C008808	III.C.C008808.7/ III-29	The o/o shall comply with District Rule 430, Breakdown Provisions with regard to equipment malfunctions, which result in excess emissions.	The o/o-shall comply with District Rule 430, Breakdown Provisions with regard to equipment malfunctions, which result in excess emissions.	This condition should be removed from Title V renewal for 2010. When cartridge performance is compromised the system automatically shuts down, thus there is no chance for excess emissions, also Rule 430 breakdown provision is already found in section II of permit.	Title V conditions should be the same for all similar equipment.
C009132	III.C.C009132.2/ III-29	This dust collector shall operate concurrently with the Super Blast Booth Number 1 (A009130).	This dust collector shall operate concurrently with the Super Blast Booth Number 1 (A009130) for C009132 or Super Blast Booth Number 2 (A009131) for C009133	Same conditions appear for two sources so make sure wording is clear.	March 2005 Title V condition number 2 is the same for C009132 and C009133, the condition wording needs to be revised in 2010 renewal to reference correct permit.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C009132	III.C.C009132.3/	The o/o shall conduct a	The o/o shall conduct a minimum program of	California Air Resources	Visible emission inspections
C009132	III-29	minimum program of inspection and maintenance on this equipment. The o/o shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State or Federal personnel upon request: a. Monthly dust collector stack observation date and result (using USEPA Method 22, and USEPA Method 9 if necessary); b. Quarterly cartridge suspension system inspection date and results; c. Date of cartridge replacements; and, d. Date and nature of any system repairs.	inspection and maintenance on this equipment. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request: a. Monthly Quarterly dust collector stack observation date and result (using USEPA method 22 and USEPA method 9 if necessary, b. Quarterly cartridge suspension system inspection date and results c. date of cartridge replacement, d. date and nature of any system repairs	Board Periodic Monitoring Recommendations for Baghouses with PTE between 25 to 300 TPY is quarterly. Thus request that visible emission inspection requirement be quarterly instead of monthly for both local permits dated January 2009and Title V permit renewal for 2010.	and dust collector inspection frequency should be consistent with CARB recommendations.
C009132	III.C.C009132.6/ III-30	This unit shall be equipped with a pressure differential monitoring system that will automatically shut the system down in the case of a broken cartridge or excessive pressure drop.	This unit system shall be equipped with a pressure differential montoring system sensors that monitor the integrity of cartridges. The system that will automatically shuts the system down in case of a broken cartridge or excessive pressure drop if the sensors indicate that the cartridge performance is compromised.	It is recommended that this condition for Title V renewal for 2010 be revised to be similar to other permits for abrasive blasting dust collectors.	Title V conditions should be the same for all similar equipment.
C009133	III.C.C009133.2/ III-29	This dust collector shall operate concurrently with the Super Blast Booth Number 1 (A009130).	This dust collector shall operate concurrently with the Super Blast Booth Number 1 (A009130) 2 A009131.	Condition No 2 on Title V permit for March 2005 does not reference Blast Booth Number 2, need to revise condition to refer to correct permit.	Title V condition number 2 is the same for C009132 and C009133. The condition wording needs to be revised to reference correct permit.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C009133	III.C.C009133.3/ III-29	The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The o/o shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State or Federal personnel upon request: a. Monthly dust collector stack observation date and result (using USEPA Method 22, and USEPA Method 9 if necessary); b. Quarterly cartridge suspension system inspection date and results; c. Date of cartridge replacements; and, d. Date and nature of any system repairs.	The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request: a. Monthly Quarterly dust collector stack observation date and result (using USEPA method 22 and USEPA method 9 if necessary, b. Quarterly cartridge suspension system inspection date and results c. date of cartridge replacement, d. date and nature of any system repairs	California Air Resources Board Periodic Monitoring Recommendations for Baghouses with PTE between 25 to 300 TPY is quarterly. Thus request that visible emission inspection requirement be quarterly instead of monthly for both local permit dated January 2009and Title V permit renewal for 2010.	Visible emission inspections and dust collector inspection frequency should be consistent with CARB recommendations.
C009133	III.C.C009133.6/ III-30	This unit shall be equipped with a pressure differential monitoring system that will automatically shut the system down in the case of a broken cartridge or excessive pressure drop.	This-unit system shall be equipped with a pressure differential montoring system sensors that monitor the integrity of cartridges. The system that will automatically shuts the system down in case of a broken cartridge or excessive pressure drop if the sensors indicate that the cartridge performance is compromised.	It is recommended that this condition for Title V renewal for 2010 be revised to be similar to other permits for abrasive blasting dust collectors.	Title V conditions should be the same for all similar equipment.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C009623	III. C. C009623.4/III-31	This equipment (S009622 and C009623) combined with emissions from S008392, S008393, S008394, S008395, S008396 and C008397 (entire Paint and Undercoat Facility Emissions Cap) shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations.	This equipment (S009622 and C009623) combined with emissions from S008392, S008393, S008394, S008395, S008396 and C008397, S009969, and C009968 (entire Paint and Undercoat Facility Emissions Cap) shall not emit to the atmosphere more than 3089 pounds of VOC per calendar year. Compliance with this condition shall be verified through reaction chamber temperature and VOC release records, calibrated with initial capture efficiency source test results and annual destruction efficiency demonstrations.	Wording on Title V permit renewal for 2010 should be consistent with all permits in paint facility since emission limit is for complete paint and undercoat facility not just these booths.	Wording on this permit needs to be clearer to represent actual emission limit cap.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C009623	III.C.C009623.6/ III-31	The owner/operator (o/o) shall conduct annual compliance tests at the Recuperative Thermal Oxidizer inlet and outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete system cycles), in accordance with the MDAQMD Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A or 25B, with USEPA Test Method 18 or CARB method 422 used to determine exempt compound concentrations. Test results shall be submitted to the District not later than six (6) weeks prior to the expiration date of this permit.	The owner/operator (o/o) shall conduct annual compliance tests at the Recuperative Thermal Oxidizer to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete concentrator cycles), in accordance with the MDAQMD's Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A or 25B, with USEPA Test Method 18 or CARB Method 422 used to determine exempt compound concentrations. Test results shall be submitted annually to the District no later than six (6) weeks prior to the expiration date of this permit. MDAQMD permit C009623.	Source test results are due annually per local permit dated January 2009, and thus source test results are due six weeks prior to expiration of local permit and not six weeks prior to Title V expiration.	Need to change wording to be clear to represent annual submittal requirement, not due every five years (six weeks prior to Title V expiration).
C009623	III. C. C009623.7/III-31 to III-32	The o/o shall conduct an initial compliance test (as described in the USEPA technical document "Guidelines for Determining Capture Efficiency," (1/9/1995)) to establish capture efficiency in accordance with the MDAQMD Compliance Test Procedural Manual. This test shall be performed within 60 days of initial operation of the control device.	The o/o shall conduct an initial compliance test (as described in the USEPA technical document "Guidelines for Determining Capture Efficiency," (1/9/1995)) to establish capture efficiency in accordance with the MDAQMD Compliance Test Procedural Manual. This test shall be performed within 60 days of initial operation of the control device.	Remove condition, it no longer applies.	Initial source test was already completed, thus this condition no longer applies.

	Title V Section				
	and Permit				
	Condition/				
Permit	Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C009968	Description/III-32	The new APCS will be a Munters Zeol System, Model Number IZS-2946-TH. This system includes: A concentrator (a continuously rotating rotor made of an absorptive medium, zeolite), which operates in three modes: adsorption, regeneration, and cooling. A Thermal Oxidizer (TO), utilizes one 2.0 million British thermal units per hour (MMBtu/hr) burner. This natural gas-fired Eclipse WX200 Burner will be set and limited to fire at a rate of 1.3 MMBtu/hr, heating the combustion chamber to approximately 1400°F. The TO will have a stack height of 20 feet and a diameter of 16 inches. The exhaust temperature is 1,400°F with a maximum exhaust flow rate of 1,000 standard cubic feet per minute (scfm).	The new APCS will be Thermal Oxidizer (Bldg 634) consisting of: a Munters Zeol System, Model Number IZS-2946-TH. This system includes: A concentrator (a continuously rotating rotor made of an absorptive medium, zeolite), which operates in three modes: adsorption, regeneration, and cooling. A Thermal Oxidizer (TO), utilizes one 2.0 million British thermal units per hour (MMBtu/hr) burner. This natural gas-fired Eclipse WX200 Burner will be set and limited to fire at a rate of 1.3 MMBtu/hr, heating the combustion chamber to approximately 1400°F. The TO is equipped with stack height of 20 feet and a diameter of 16 inches. The exhaust temperature is 1,400°F with a maximum exhaust flow rate of 1,000 standard cubic feet per minute (scfm).	Revise wording on Title V 2010 renewal to present tense.	Wording should be clearer, Title V wording implies unit is proposed and not yet built. Wording should be changed to present tense.

Permit	Title V Section and Permit Condition/ Page No. in this				
Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C009968	III.C.C009968.6/ III-33	The owner/operator (o/o) shall conduct annual compliance tests at the Recuperative Thermal Oxidizer inlet and outlet to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete system cycles), in accordance with the MDAQMD Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A or 25B, with USEPA Test Method 18 or CARB method 422 used to determine exempt compound concentrations. Test results shall be submitted to the District not later than six (6) weeks prior to the expiration date of this permit.	The owner/operator (o/o) shall conduct annual compliance tests at the Recuperative Thermal Oxidizer to determine VOC concentrations at high VOC loading and corresponding destruction efficiency (over three separate complete system cycles), in accordance with the MDAQMD Compliance Test Procedural Manual. VOC concentrations shall be determined in accordance with USEPA Test Methods 25, 25A or 25B, with USEPA Test Method 18 or CARB Method 422 used to determine exempt compound concentrations. Test results shall be submitted annually to the District no later than six (6) weeks prior to the expiration date of this permit. MDAQMD permit C009968.	Source test results are due annually per local permit dated January 2009, and thus source test results are due six weeks prior to expiration of local permit and not six weeks prior to Title V expiration.	Need to change wording to be clear to represent annual submittal requirement, not due every five years (six weeks prior to Title V expiration).
C009968	III.C.C009968.7/ III-33	The o/o shall conduct an initial compliance test (as described in the USEPA technical document, Guidelines for Determining Capture Efficiency, (1/9/1995)) to establish capture efficiency in accordance with the MDAQMD Compliance Test Procedural Manual. This test shall be performed within 60 days of initial operation of the control device.	The o/o shall conduct an initial compliance test (as described in the USEPA technical document, Guidelines for Determining Capture Efficiency, (1/9/1995)) to establish capture efficiency in accordance with the MDAQMD Compliance Test Procedural Manual. This test shall be performed within 60 days of initial operation of the control device	Please remove condition from Title V 2010 renewal since it no longer applies.	This device has been constructed and source test has already been completed and submitted, thus condition is no longer needed.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C010219	N/A/III-33	N/A	DUST COLLECTORS, MDAQMD permit numbers C010219 consisting of: Filter House for Internal Blast Equipment, including a Sunspan Systems Inc. Model SSC-9-XLC-SOC, Dust Collector with a flow rate of 4500 cfm, inlet velocity of 3800 lfm, and outlet velocity of 3300 lfm. Device contains 9 mounted in 3-rows of 3 High inlet cartridge filters with a total surface area of 2682 sqft. Filter media is 80:20 blend of pleated cellulose and polyester fiber. Air to Cloth ratio is 1.68:10. Fan motor is 10 hp.	Device is new, conditions and description matching finalized local PTO dated May 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.
C010219	N/A/III-34	N/A	This equipment shall be installed, operated, and maintained in strict accord with those recommendations of the manufacturer's/supplier's recommendations and/or sound engineering principles which produce the minimum emissions of contaminants.	Device is new, conditions and description matching finalized local PTO dated May 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.
C010219	N/A/III-34	N/A	Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit was issued unless otherwise noted below.	Device is new, conditions and description matching finalized local PTO dated May 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.
C010219	N/A/III-34	N/A	This dust collector shall be functioning at all times that the Abrasive Blasting equipment covered under Permit A004412 is in operation	Device is new, conditions and description matching finalized local PTO dated May 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C010219	N/A/III-34	N/A	The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request: a.Quarterly dust collector stack observation date and result (using USEPA Method 22 and USEPA Method 9 if necessary, b. Quarterly cartridge and cartridge suspension system inspection date and results, c. date of cartridge replacement, d. date and nature of any system repairs	It is recommended that the local permit dated May 20008, conditions 4 and 6 be combined into one. The California Air Resources Board Periodic Monitoring Recommendations For Generally Applicable Requirements in SIP" published by the CARB Periodic Working Group in June 1999 states that Baghouses with PTE between 25 to 300 TPY perform monitoring quarterly. Thus request that visible emission inspection requirement be quarterly instead of weekly. Title V 2010 renewal conditions need to be updated to represent local permit which requires implementation of an inspection program along with maintenance program and requires the inspection of the cartridge suspension system on a quarterly basis.	Visible emission inspections and dust collector inspection frequency should be consistent with CARB recommendations and the permit conditions should be consistent with other similar sources.
C010219	N/A/III-34	N/A	The o/o shall maintain an inventory of filter cartridges on-site at all times which will ensure compliance.	Device is new, conditions and description matching finalized local PTO dated May 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C010219	N/A/III-34	N/A	An annual compliance/certification test of this unit for particulate and PM10 is not required. However, the Owner/Operator shall conduct such testing upon District request and shall be in accordance with the District "Compliance Test Procedural Manual."	Revise May 2008 local permit condition wording to allow flexibility with source testing. Then revise Title V 2010 renewal to match.	The maximum hourly emissions of particulate matter (PM) from this abrasive blast unit, assuming 99.5% control efficiency (based on manufacturer specifications), is 0.75 lbs/hr. This is less than the Rule 405 requirement of 0.99 lbs / hour. The maximum concentration of PM emissions is 0.0194 grains/cubic feet. This is also well below the limit of 0.107 grains/cubic feet emissions limit set by rule 404. The PM emissions from the abrasive blast unit are clearly below the applicable Rules 404 and 405 requirements. There is no justification or precedence for the requirement of a source tests to demonstrate compliance with Rules 404 and 405. The proposed condition allows the District to request source testing, if needed, without making this into an unnecessary annual requirement. The Title V needs to be updated to match local permit.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
C010410	N/A/III-34	N/A	DUST COLLECTOR (BLDG 566) consisting of: Donaldon Cartridge Dust Collector, Model No. DFT 4-256, manufactured by Torit, Inc, Rated at 126,500 cfm, containing 256 filters, mounted in 4 rows of 64, comprised of cellulose substrate w/nylon membrane surface treatment, each with a 254 square feet filter area. Dust collector powered by a 200 hp fan and motor. Inlet and outlet velocity is 3,500 fpm. Collector has an Air to Cloth ratio of 1.9:1.0 and Dust Control Efficiency of 99.999%.	Device is new, conditions and description matching finalized local PTO dated October 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.
C010410	N/A/III-35	N/A	The owner/operator (o/o) shall operate/maintain this equipment is strict accord with the recommendations of the manufacturer and/or sound engineering practices.	Device is new, conditions and description matching finalized local PTO dated October 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.
C010410	N/A/III-35	N/A	This dust collector shall be operated concurrent with the Abrasive Blast Booth in Building 566 operating under valid District permit A005113.	Device is new, conditions and description matching finalized local PTO dated October 2008 need to be added to Title V renewal for 2010.	Title V needs to be updated to match local permit.
C010410	N/A/III-35	N/A	The o/o shall conduct a minimum program of inspection and maintenance on this equipment. The owner/operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State, or Federal personnel upon request: a. Quarterly dust collector stack observation date and result (using USEPA Method 22 and USEPA Method 9 if necessary); b. Quarterly cartridge and cartridge suspension system inspection date and results, c. date of cartridge replacement, and d. date and nature of any system repairs	Device is new, conditions and description for recordkeeping should be the same as similar equipment.	Title V conditions should be the same for all similar equipment.

Permit Number D005319	Title V Section and Permit Condition/ Page No. in this application: III.D.D005319.89 /III-36	Title V Permit Condition The degreaser shall only be operated and maintained in strict accord with the manufacturer's/supplier's recommendations and/or sound engineering principles.	Recommended Revision The degreaser shall only be operated and maintained in strict accord with District Rule 1104 and the manufacturer's/supplier's recommendations and/or sound engineering principles.	Comment Add reference to Rule 1104 to make consistent with local permit dated January 2009.	Justification Title V should be modified to be consistent with local permit.
D005319	N/A/III-36 (see condition #7)	N/A	The hoist speed must be slow enough to prevent solvent vapors from being pushed and/or pulled out of the tank. The hoist speed must not exceed 30 feet per minutes and any new or replacement hoist must not exceed 11.2 feet per minute.	Condition appears on local permit dated January 2009 and should be added to Title V renewal for 2010.	Title V should be modified to be consistent with local permit.
E003845 E004392 E005003 E009529	Description and Title V conditions/III-36 to III-37	See Title V	Remove conditions	This device is not used to support the maintenance center or IWTP it should be removed from Title V.	Title V only applies to devices that are used to support Yermo Maintenance Center and IWTP.
E004391 E004501 E005016 E005017	III.E.E004391.2 III.E.E004501.2 III.E.E005016.2 III.E.E005017.2 /III-37	Engine may operate in response to notification of impending rotating outage if the area utility has ordered rotating outages in the area where the engine is located or expects to order such outages at a particular time, the engine is located in the area subject to the rotating outage, the engine is operated no more than 30 minutes prior to the forecasted outage, and the engine is shut down immediately after the utility advises that the outage is no longer imminent or in effect.	Engine may operate in response to notification of impending rotating outage if the area utility has ordered rotating outages in the area where the engine is located or expects to order such outages at a particular time, the engine is located in the area subject to the rotating outage, the engine is operated no more than 30 minutes prior to the forecasted outage, and the engine is shut down immediately after the utility advises that the outage is no longer imminent or in effect.	This condition has been removed from local permits dated January 2009 and should be removed from Title V renewal for 2010.	This condition is not applicable. It has been removed from local PTO.

and Permit	
Condition/	
Permit Page No. in this	
Number application: Title V Permit Condition Recommended Revision Comment	Justification
E004391 III.E.E004391.65 The owner/operator (o/o) shall The owner/operator (o/o) shall maintain a operations Title V requires records	There is no regulatory reason
E004501 III.E.E00450165 maintain a operations log for log for this unit current and on-site, either at the	
E005016 III.E.E00501665 this unit current and on-site, engine location or at a on-site location, for a minimum years, recommend	maintaining records. Title V
E005017 III.E.E00501765 either at the engine location or of five (5) years, and for another year where it can removing requirement for the engine location or of five (5) years, and for another year where it can removing requirement for the engine location or of five (5) years, and for another year where it can removing requirement for the engine location or of five (5) years, and for another year where it can remove the engine location or of five (5) years, and for another year where it can remove the engine location or of five (5) years, and for another year where it can remove the engine location or of five (5) years, and for another year where it can remove the engine location or of five (5) years, and for another year where it can remove the engine location or of five (5) years, and for another year where it can remove the engine location or of five (5) years, and for another year where it can remove the engine location or of the engine location of	
/III-38 at a on-site location, for a be made available to the District staff within 5 an additional six year	stringent than regulatory
minimum of five (5) years, and working days from the District's request, and this from Title V renewal for	requirements.
for another year where it can be log shall be provided to District, State and Federal 2010.	
made available to the District personnel upon request. The log shall include, at a	
staff within 5 working days minimum, the information specified below: a. Date	
from the District's request, and of each use and duration of each use (in hours); b.	
this log shall be provided to Reason for use (testing & maintenance, emergency,	
District, State and Federal required emission testing); c. Calendar year	
personnel upon request. The log shall include, at a minimum, and total hours; and, d. Fuel sulfur concentration (the	
log shall include, at a minimum, the information specified below: and total hours; and, d. Fuel sulfur concentration (the o/o may use the supplier's certification of sulfur	
a. Date of each use and content if it is maintained as part of this log).	
duration of each use (in hours);	
b. Reason for use (testing &	
maintenance, emergency,	
required emission testing); c.	
Calendar year operation in	
terms of fuel consumption (in	
gallons) and total hours; and, d.	
Fuel sulfur concentration (the	
o/o may use the supplier's	
certification of sulfur content if	
it is maintained as part of this	
log). E004391 III.E.E00439176 This unit is subject to the This unit genset is subject to the requirements of the Change wording from	Condition should be clear and
E004591 III.E.E004591.76 This unit is subject to the Fequirements of the Airborne Toxic Control Measure (ATCM) for unit to genset. Make sure to the Fequirements of the Airborne Toxic Control Measure (ATCM) for unit to genset. Make sure to the Fequirements of the Airborne Toxic Control Measure (ATCM) for unit to genset. Make sure to the Fequirements of the Airborne Toxic Control Measure (ATCM) for unit to genset. Make sure to the Fequirements of the Airborne Toxic Control Measure (ATCM) for unit to genset.	
E005016 III.E.E00501676 Toxic Control Measure Stationary Compression Ignition Engines (Title 17 to differentiate on 2010	should be a note in Title V to
E005017 III.E.E00501776 (ATCM) for Stationary (CCR 93115). In the event of conflict between these Title V renewal that this	
/III-38 Compression Ignition Engines conditions and the ATCM, the requirements of the condition is not SIP	federally enforceable.
(Title 17 CCR 93115). In the ATCM shall govern. (STATE ENFORCEABLE approved and only	iodolaily officioadic.
event of conflict between these ONLY") epitote and only	
conditions and the ATCM, the	
requirements of the ATCM shall	
govern.	

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Permit Number E005016 E005017	Title V Section and Permit Condition/ Page No. in this application: III.E.E005016. 5 III.E.E005017.5 /III-38	Title V Permit Condition This unit shall be limited to use for emergency power, defined as in response to a fire or when commercially available power has been interrupted. In addition, this unit shall be operated no more than 20 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 20	Recommended Revision This unit shall be limited to use for emergency power, defined as in response to a fire or when commercially available power has been interrupted, or when boiler control air pressure is not otherwise available due to repair or maintenance of electrically-driven compressors. In addition, this unit shall be operated no more than 20 hours per year for testing and maintenance, excluding compliance source testing. Time required for source testing will not be counted toward the 20 hour per year limit.	Comment Revise Title V 2010 renewal to be consistent with definition as defined in local permits dated January 2009.	Justification Definition of emergency power for this generator needs to be consistent with local permit.
E005337	Description and	hour per year limit. See Title V	Remove conditions	This device is not used to	Title V only applies to devices
E005337 E005338	Title V	See Title v	Remove conditions	support the maintenance	that are used to support Yermo
E008109 E008110 E008334	conditions/III-38 to III-40			center or IWTP it should be removed from Title V.	Maintenance Center and IWTP.

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	Permit	Page No. in this	The W.D. and Co. 122	D 1. 1 D 22	G	T
ŀ	Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
	S002872	Description/III-40	PAINT SPRAY BOOTH,	PAINT SPRAY BOOTH, MDAQMD permit number	Pressure drop range is incorrect on March 2005	Local permits were modified
			MDAQMD permit number S002872 (Bldg. 573, Area 18;	S002872 (Bldg. 573, Area 18; North Bay 3) consisting of: Binks Model No. TF-644-T-LH with	Title V description.	to reflect correct pressure drop readings for units, but Title V
			North Bay 3) consisting of:	oven as follows: This oven is used to dry freshly	Pressure drop range	version was never modified.
			Binks Model No. TF-644-T-LH	coated tactical vehicles/equipment. The oven is	should be 0.25" - 2.5"	Title V needs to be modified
			with oven as follows: This oven	heated using 402 F hot water @ 250 psig. The oven is	W.C. to be consistent	to be consistent with local
			is used to dry freshly coated	35'L x 21'W x 19'H. Heat exchangers with the hot	with local permit dated	permit.
			tactical vehicles/equipment.	water transmitted by heating plant No.5 are about	January 2009.	Permit.
			The oven is heated using 402 F	1680 sq ft of surface area in the oven. Ancillary to this		
			hot water @ 250 psig. The oven	is oven No. 2, which is described as a Benco		
			is 35'L x 21'W x 19'H. Heat	Products, Inc. model CPD-12F-CS. The oven is steel		
			exchangers with the hot water	with galvanized wall panels, doors and roof. The		
			transmitted by heating plant	doors on either end of the oven allow for equipment		
			No.5 are about 1680 sq ft of	entering and/or leaving. The oven is equipped with a		
			surface area in the oven.	temperature controller and a dial thermometer. Air is		
			Ancillary to this is oven No. 2,	circulated by means of a 15,000 ACFM blower		
			which is described as a Benco	powered by a 15 hp electric motor. Volume of		
			Products, Inc. model CPD-12F-	Booth: 14,400 eu. Ft ³ ., (20'w x 40'l x 18'h)		
			CS. The oven is steel with galvanized wall panels, doors	Air Flow Rate: 35,800 ACFM, 15 hp Motors, 2 @		
			and roof. The doors on either	7.5 hp each, Pressure Drop Range: 0.25" — 1.0" 2.5" W.C. 3"		
			end of the oven allow for	Dry Filter material: Polyester Fiber @ 2.0" thick		
			equipment entering and/or	USMC Account No.: 389381		
			leaving. The oven is equipped	051/10 11 00 0 unit 11011 50/501		
			with a temperature controller			
			and a dial thermometer. Air is			
			circulated by means of a 15,000			
			ACFM blower powered by a 15			
			hp electric motor. Volume of			
			Booth: 14,400 cu. Ft., (20'w x			
			40'l x 18'h)			
			Air Flow Rate: 35,800 ACFM,			
			15 hp Motors, 2 @ 7.5 hp each,			
			Pressure Drop Range: 0.25" –			
			1.0" W.C. 3"			
			Dry Filter material: Polyester Fiber @ 2.0" thick			
			USMC Account No.: 389381			
L			USIVIC ACCOUNT NO., 389381			

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Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S002872 S002873 S004558	N/A/III-50	N/A	This equipment (and related application equipment) shall be operated in compliance with all data and specification submitted with the application under which this permit is issued unless otherwise noted below.	This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010.	Conditions on local permit and Title V should be similar for all of the same equipment.
S002872 S002873	III.S.S002872.1 III.S.S002873.1/ III-41	For purposes of this permit the term "Organic Solvent" is defined to mean volatile organic portion of all paints, lacquers, stains, preservatives, diluents, thinners, reducers, cleaners, etc., used to prepare an item for coating, coat the item, and for post cleaning of the item and all equipment used in the cleaning and coating activities.	For purposes of this permit the term "Organic Solvent" is defined to mean volatile organic portion of all paints, lacquers, stains, preservatives, diluents, thinners, reducers, cleaners, etc., used to prepare an item for coating, coat the item, and for post cleaning of the item and all equipment used in the cleaning and coating activities.	This condition no longer appears on local permit dated January 2009, recommend removing from Title V renewal for 2010.	Conditions on local permit and Title V should be consistent.
S002872	III.S.S002872.26/ removed from III- 41 and added to III-50	The total amount of photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 7.9 lb/hr and 39.6 lb/day.	This spray booth is currently not required to vent through operating APCS covered by District permit C004561, therefore, the emissions from this equipment are limited to less than 25 lbs per/day [per MDAQMD rule 1303(A)(2)] verified through record keeping requirements pursuant to recordkeeping condition below. The total amount of photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 7.9 lb/hr and 39.6 lb/day.	This device is not vented to APCS thus the VOC limit on local permit dated January 2009 is more stringent than that listed on March 2005 Title V. Permit condition on Title V 2010 renewal needs to be revised to match but make sure it references recordkeeping condition or correct condition number.	Conditions on local permit and Title V should be consistent. Please note that local permit may have recordkeeping requirement as condition 8. but This condition number may differ on Title V.
S002872 S002873	III.S.S002872.3 III.S.S002873.3/ III-41	The total amount of non-photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 81 lb/hr and 600 lb/day.	The total amount of non-photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 81 lb/hr and 600 lb/day.	This condition no longer appears on local permit dated January 2009. This condition no longer applies due to revision for condition to 25 lbs/day.	Conditions on local permit and Title V should be consistent.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S002872 S008392 S008393 S008394 S008395 S008396 S009622 S009969	III.S.S002872.4 III.S.S008392.7 III.S.S008393.8 III.S.S008394.8 III.S.S008395.8 III.S.S008396.8 III.S.S009622.3 III.S.S009969.3 /Removed from III-41, III-44, III-46, III-47; added to III-51 to III-52	A daily solvent usage log shall be maintained for each permit unit with the uses and/or releases of organic solvents. This log shall contain, as a minimum, the date, hours operated, material and amounts used on a daily basis. Additionally, the log must contain the pressure drop across the air emission control device. Note: The daily log information provides a basis for the Toxic Emissions Inventory required by AB2588 (STATE-ENFORCEABLE, ONLY).	The owner/operator (o/o) shall maintain current and on-site for a minimum of five (years) a daily operational log (for each day the equipment is in operation). This daily log shall be provided to the District, State, or Federal personnel upon request and shall include at a minimum, the following information: a. Type and amount (in pounds or gallons) of coating and solvent used (preparation, thinning and cleanup or other). b. VOC content of each type of coating and solvent in pounds per gallon or grams per liter; c. Non-VOC content of each type of coating and solvent; d. The method of application and type of substrate for each use; e. Total VOC emissions in pounds per calendar day; f. Total non-VOC solvent emissions in pounds per calendar day; and g. Discharge filter pressure drop	This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010.	Conditions on local permit and Title V should be similar for all of the same equipment.
S002872	III.S.S002872.5/ III-41	A combined daily VOC emission report for these permits shall be prepared at least once a month. The logs and reports shall be maintained on-site for at least five (5) years and made available to District, state or federal personnel upon request.	A combined daily VOC emission report for these permits shall be prepared at least once a month. The logs and reports shall be maintained on-site for at least five (5) years and made available to District, state or federal personnel upon request.	This condition no longer appears on local permit dated January 2009. This condition no longer applies due to revision for daily recordkeeping.	Conditions on local permit and Title V should be consistent.
S002872 S002873	III.S.S002872.6 III.S002873.6/Re moved from III- 41 and added to III-50	This equipment shall only be operated/maintained in strict accord with manufacturer's/supplier's recommendations and/or sound engineering principles.	This equipment (and related application equipment) shall only be operated/ be operated and maintained in strict accord with manufacturer's/supplier's recommendations of its manufacturer or supplier and/or sound engineering principles.	This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010.	Conditions on local permit and Title V should be similar for all of the same equipment.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S002872 S002873 S004558	N/A/Added to page III-50	N/A	Only High Volume Low Pressure (HVLP) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in this booth unless written approval is obtained from the District.	This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010.	Conditions on local permit and Title V should be similar for all of the same equipment.
S002872 S002873 S002876 S004558 S008392 S008393 S008394 S008395 S008396 S009622	N/A/Added to page III-50	N/A	Discharge filters shall be installed/maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the manufacturer's/designer's recommended range of 0.25 to 2.5 inches WC.	This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010, pressure differential should be 0.25 to 2.5 inches WC.	Conditions on local permit and Title V should be similar for all of the same equipment.
\$002872 \$002873 \$002876 \$002876 \$004558 \$008392 \$008393 \$008394 \$008395 \$008396 \$009622 \$009969	N/A/Added to page III-50	N/A	If the emergency bypass sequence is activated, the event shall be reported to the District in accordance with District Rule 430.	This condition does not appear on March 2005 Title V, recommend adding to Title V renewal for 2010 for consistency with local permits dated January 2009.	Conditions on local permit and Title V should be consistent.

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Number	application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S002873	Description/III-40	PAINT SPRAY BOOTH,	PAINT SPRAY BOOTH, MDAQMD permit number	Pressure drop range is	Local permits were modified
	to III-41	MDAQMD permit number	S002873 (Bldg. 573, Area 18 North, Bay 2)	incorrect on March 2005	to reflect correct pressure drop
		S002873 (Bldg. 573, Area 18	consisting of: Binks Model No. TF-644-T-LH.	Title V description.	readings for units, but Title V
		North, Bay 2) consisting of:	This oven is used to dry freshly coated tactical	Pressure drop range	version was never modified.
		Binks Model No. TF-644-T-	vehicles/equipment. The oven is heated using 402 F	should be 0.25" - 2.5"	Title V needs to be modified
		LH.	hot water @ 250 psig. Heat exchangers with the hot	W.C. to be consistent	to be consistent with local
		This oven is used to dry freshly coated tactical	water transmitted by heating plant No.5 are about 1680 sq ft of surface area in the oven.	with local permit dated January 2009.	permit.
		vehicles/equipment. The oven	Ancillary to this is oven No. 2, which is described as	January 2009.	
		is heated using 402 F hot water	a Benco Products, Inc. model CPD-12F-CS.		
		@ 250 psig. Heat exchangers	Volume of Booth: 14,400 eu. Ft ³ ., (20'w x 40'l x		
		with the hot water transmitted	18'h)		
		by heating plant No.5 are about	Air Flow Rate: 35,800 ACFM,		
		1680 sq ft of surface area in the	Motors, 2 @ 7.5 hp each		
		oven.	Pressure Drop Range: 0.25" — 1.0 2.5" W.C.		
		Ancillary to this is oven No. 2,	The oven is 35 ft by 21 ft by 19 ft high. The oven is		
		which is described as a Benco	steel with galvanized wall panels, doors and roof.		
		Products, Inc. model CPD-12F-	The doors on either end of the oven allow for		
		CS.	equipment entering and/or leaving.		
		Volume of Booth: 14,400 cu.	The oven is equipped with a temperature controller		
		Ft., (20'w x 40'l x 18'h) Air Flow Rate: 35,800 ACFM,	and a dial thermometer. Air is circulated by means of a 15,000 ACFM blower powered by a 15 hp electric		
		Motors, 2 @ 7.5 hp each	motor.		
		Pressure Drop Range: 0.25" –	USMC Account No.: 389380		
		1.0" W.C.	CSW1C 11000ant 110 307300		
		The oven is 35 ft by 21 ft by 19			
		ft high. The oven is steel with			
		galvanized wall panels, doors			
		and roof. The doors on either			
		end of the oven allow for			
		equipment entering and/or			
		leaving.			
		The oven is equipped with a			
		temperature controller and a dial thermometer. Air is			
		circulated by means of a 15,000			
		ACFM blower powered by a 15			
		hp electric motor.			
		USMC Account No.: 389380	Englagura 2 Daga 49		
		Conte Account No. 309300	Enclosure 3, Page 48	l	

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S002873	III.S.S002873.2/R emoved from III- 41	The total amount of photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 7.9 lb/hr and 39.6 lb/day.	The total amount of photochemically reactive organic solvents released to the atmosphere from this paint spray booth is limited to 7.9 lb/hr and 39.6 lb/day.	This device is vented to the APCS. The APCS C004561 has conditions for VOC emission limits thus this limit should not be listed in Title V renewal for 2010.	Conditions on local permit and Title V should be consistent.
S002873	III.S.S002873.4/R emoved from III- 41; added to III- 51	A daily solvent usage log shall be maintained for each permit unit with the uses and/or releases of organic solvents. This log shall contain, as a minimum, the date, hours operated, material and amounts used on a daily basis. Additionally, the log must contain the pressure drop across the air emission control device. Note: The daily log information provides a basis for the Toxic Emissions Inventory required by AB2588 (STATE-ENFORCEABLE, ONLY).	The pressure drop across the discharge filters shall be taken and recorded in the operational log each day the booth is in operation.	Recordkeeping condition for VOC appears on C004561 March 2005 Title V thus does not need to appear on S002873. Condition for pressure drop across filters should be consistent and appear on all booth permits for Title V 2010 renewal.	Conditions on local permits dated January 2009 and Title V renewal for 2010 should be similar for all of the same equipment.
S002873	III.S.S002873.5/R emoved from III- 41	A combined daily VOC emission report for these permits shall be prepared at least once a month. The logs and reports shall be maintained on-site for at least five (5) years and made available to District, state or federal personnel upon request.	A combined daily VOC emission report for these permits shall be prepared at least once a month. The logs and reports shall be maintained on-site for at least five (5) years and made available to District, state or federal personnel upon request.	This condition no longer appears on local permit dated January 2009 since booth requires daily VOC calculations from APCS.	Conditions on local permit and Title V should be consistent.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S002873	N/A/Added to III-51	N/A	This spray booth shall not be operated unless it is vented to the operating APCS covered by District permit C004561.	This condition does not appear on March 2005 Title V but appears on January 2009 local permit, recommend adding to Title V for 2010 renewal for consistency.	Conditions on local permit and Title V should be consistent.
S002876	III.S.S002876.3/R emoved from III- 42/Added to III- 50	Only High Volume Low Pressure (HVLP) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in the spray booth unless prior written approval is obtain from the District.	Only High Volume Low Pressure (HVLP) spray guns, hand-held Aerosol Coating Products, or Hand Application Methods shall be used in the spray booth unless prior written approval is obtained from the District.	Revise condition on Title V for 2010 renewal for clarity.	Conditions on local permit and Title V should be consistent.
S002876 S008392 S008393 S008394 S008395 S008396 S009622 S009969	III.S.S002876.5 (removed from III-42); III.S.S008392.6 (removed from III-744); III.S.S008393.7 III.S.S008394.7 III.S.S008396.7 (removed from III-45 to III-46); III.S.S009622.2 (removed from III-46); III.S.S009969.2 (removed from III-48)	The pressure drop across the spray booth discharge filters shall be taken and recorded in the operational log each day the booth is in operation.	The pressure drop across the spray booth discharge filters shall be taken and recorded in the operational log each day the booth is in operation.	Remove this condition from Title V for 2010 renewal, recordkeeping condition for this permit already requires recording pressure drop.	Redundant condition

Permit Number S004558	Title V Section and Permit Condition/ Page No. in this application: III.S.S004558.2 /Removed from III-43, Added to III-50	Title V Permit Condition This equipment shall only be operated/maintained in strict accord with manufacturers/supplier's recommendations and sound engineering principles.	Recommended Revision This equipment (and related application equipment) shall only be operated/ be operated and maintained in strict acord with manufacturer's/supplier's recommendations of its manufacturer or supplier and/or sound engineering principles.	Comment This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010.	Justification Conditions on local permit and Title V should be similar for all of the same equipment.
S004558	III.S.S004558.5/ Removed from III-43	The spray booth shall have an interlock that does not allow painting unless the APCS, covered by District permit C004561, is fully operational.	The spray booth shall have an interlock that does not allow painting unless the APCS, covered by District permit C004561, is fully operational.	Please remove this condition from Title V for 2010 renewal, this condition is redundant since it must already be vented and ducted to C004561 and operate only when C004561 is operating. Similar condition does not appear on local permit dated January 2009.	Conditions on local permit and Title V should be consistent.
S004558	N/A/Added to III-	N/A	The pressure drop across the discharge filters shall be taken and recorded in the operational log each day the booth is in operation.	This condition wording is clearer and appears on other local permits dated January 2009, it should appear the same on all local permits and the Title V renewal for 2010. Requirement for voc recordkeeping is part of C004561.	Conditions on local permit and Title V should be similar for all of the same equipment.
S008393 S008394 S008395 S008396	III.S.S008393.3 III.S.S008394.3 III.S.S008395.3 III.S.S008396.3/ Removed from III-45	This paint drying oven shall only process items which have been coated with one of the spray booths with valid District Permits S008392, S008393, S008394, S008395, or S008396.	This paint drying oven shall only process items which have been coated with one of the spray booths with valid District Permits S008392, S008393, S008394, S008395, or S008396.	This condition is redundant since C008397 on March 2005 Title V already requires that all these ovens and booths be vented to that device.	Conditions on local permit and Title V should be similar for all of the same equipment.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
S009622	III.S.S009622.9/R	The o/o shall not use any motor	The o/o shall not use any motor vehicle or mobile	This condition is not	Title V should not include
S009969	emoved from III- 47; III.S.S009969.8 and 9/Removed from III-49	vehicle or mobile equipment coating that contains hexavalent chromium or cadmium (Section 17 CCR 93112 - Airborne Toxic Control Measure for Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings). Compliance with this condition shall be verified by the retention of MSDS sheets (or equivalent documentation of chemical content) for every applicable coating used at the facility for-five (5) years, and the provision of said information to District, State or Federal personnel upon request.	equipment coating that contains hexavalent chromium or cadmiulm (Section 17 CCR 93112 – Airborne Toxic Control Measure for Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings). Compliance with this condition shall be verified by the retention of MSDS sheets (or equivalent documentation of chemical content) for every applicable coating used at the facility for five (5) years, and the provision of said information to District, State or Federal personnel upon request.	federally enforceable it should not appear on Title V renewal for 2010.	conditions that apply only to state and which are not federally enforceable.
S009622	S009662.8/	Operations within this booth	Operations within this booth shall comply with	This condition should be	Facility Wide conditions in
	Remove from III- 47	shall comply with District Rules 442, 114, 1115, 1116, and 1118 as appropriate.	District Rules 442, 114, 1115, 1116, and 1118 as appropriate.	removed from Title V renewal for 2010.	Title V already require compliance with these rules.
T003861	T003861/III-55	See Title V conditions	Remove conditions	Condition should be removed from Title V renewal for 2010. Equipment is no longer a gasoline tank. Tank is 288 gallon tank storing diesel, due to properties of diesel and size of tank, permit is not required	Title V needs to be modified to not include equipment that is exempt from permitting per MDAQMD Rule 219.

Permit Number	Title V Section and Permit Condition/ Page No. in this application:	Title V Permit Condition	Recommended Revision	Comment	Justification
T003926	Description/III-55	INDUSTRIAL WASTE WATER TANK, MDAQMD permit number T003926, consisting of: BUILDING 609; Open top, 21,000 gal., 40' 1 x 9 ' h x 8' w.	INDUSTRIAL WASTE WATER TANKS, MDAQMD permit number T003926, consisting of: BUILDING 609; Two aboveground Open top storage tanks (raw storage T-1 and raw storage tank T-2), SN 70-22 and 70-23 used for equalization of influent wastewater flows to the IWTP. Equipped with an oil skimmer which feeds Oily Water Storage Tank T-20 through a joint collection box. Raw Storage Tank T-1, 40°1 x 9 ° h x 8° w 21,000 gallon capacity, Raw Storage Tank T-2 40°1 x 9 ° h x 8° w 21,000 gallon capacity., 40° 1x 9 ° h x 8° w.	Permit was recently modified in June 2009 (dated January 2009). Title V renewal for 2010 needs to be modified to reflect changes.	Title V and local permits should match.
T003926	III.T.T003926.2/ III-56	The o/o shall maintain a log of the records to verify proper disposal to Certified off-base handing facilities, including quantity. These records shall be maintained on site for a minimum of five years.	The o/o shall maintain a log of the records to verify proper disposal of the oil collected in Tank T-20 to Certified off-base handing facilities, including date of disposal and quantity disposed. These records shall be maintained on site for a minimum of five years.	Permit dated January 2009 was recently modified in June 2009. Title V renewal for 2010 needs to be modified to reflect changes.	Title V and local permits should match.
T003927	Description and Title V Conditions/III-55 and III-56	See Title V and local permits	Remove conditions	In June 2009 Permit was removed and combined with local permit T003926 (dated January 2009).	Permit was recently removed and combined with permit T003926.

Permit	Title V Section and Permit Condition/ Page No. in this	Title V Permit Condition	Recommended Revision	Comment	Justification
Number T005251	application: Description/III-55 to III-56	PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANK, MDAQMD permit number T005251, TANK NO. 679251 consisting of: 39'8" l x 9'6" dia., Carbon steel 20,000 gallons.	PORTABLE INDUSTRIAL WASTEWATER ABOVEGROUND STORAGE TANKS (Building 611) consisting of: , MDAQMD permit number T005251, TANK NO. 679251 four temporary retention storage tanks (Tanks No. 679251, 6 79252, 679253, and 679254) handling surge flow from the Wet Well. consisting of: 39'8" 1 x 9'6" dia., Carbon steel 20,000 gallons. Retention Storage Tank No. 1, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity, Retention Storage Tank No. 2, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity, Retention Storage Tank No. 3, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity, Retention Storage Tank No. 4, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity, Retention Storage Tank No. 4, carbon steel cylinder 39'-8" by 9'6" D, 20,000 gallon capacity	Permit dated January 2009 was recently modified in June 2009. Title V renewal for 2010 needs to be modified to reflect changes.	Title V and local permits should match.
T005251	III.T.T005251.2/ III-56	The o/o shall maintain a log of the records to verify proper disposal to Certified off-base handing facilities, including quantity. These records shall be maintained on site for a minimum of five years.	The o/o shall maintain a log that includes the date and total volume of liquids disposed of of the records to verify proper disposal to Certified offbase handing facilities, including quantity from the retention tanks. These records shall be maintained on site for a minimum of five years.	The retention tanks are temporary tanks that will only infrequently dispose of liquids to off-base handling facilities. Permit dated January 2009 was recently modified in June 2009. Title V renewal for 2010 needs to be modified to reflect changes.	Wording of conditions needs to be clear and reflect actual conditions.
T005252 T005253 T005254	Description and Title V Conditions/III-56	See Title V and local permits	Remove conditions	Permit dated January 2009 was recently removed in June 2009 and combined with T005251. Title V renewal for 2010 needs to be modified to reflect changes.	Permit was recently removed and combined with permit T005251.

Permit Number T005118	Title V Section and Permit Condition/ Page No. in this application: III.T.T005118.1/ III-57	Title V Permit Condition The o/o shall install, maintain and operate this unit in strict	Recommended Revision The o/o shall install, maintain and operate this unit This equipment shall be installed, operated and	Comment Make condition consistent with other	Justification Title V and local conditions should be consistent for
		accord with those recommendations of the manufacturer/ supplier, which produce minimum emissions of VOCs.	maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles, which produce the minimum emissions of VOCs contaminants.	sound engining recommendations	similar equipment.
T005118	III.T.T005118.2/ III-57	The o/o shall maintain a log, which delineates the dates of filling, volume and additions and dates of maintenance and repair of this unit. The log shall be maintained current, on-site for 5 years and provided to District, Cal-EPA and USEPA on request.	The owner/operator (o/o) shall maintain a daily operational log (for each day the equipment is in operation), which delineates the dates of filling, volume and additions and dates of maintenance and repair of this unit. The log shall be maintained current, on-site for 5 years and provided to District, Cal EPA and USEPA on State or Federal personnel upon request.	Make wording clearer and consistent with other record keeping requirements.	Title V and local conditions should be consistent for similar equipment.
N/A	V.B.I.A/V-88 to V-89	Permittee may make a proposed change to equipment covered by this permit that is not expressly allowed or prohibited by this permit if: Permittee has applied for and obtained all permits and approvals required by AVAQMD Regulation II and Regulation XIII unless the equipment involved in the change is exempt from obtaining such permits and approvals pursuant to the provisions of Rule 219; and	Permittee may make a proposed change to equipment covered by this permit that is not expressly allowed or prohibited by this permit if: Permittee has applied for and obtained all permits and approvals required by AVAQMD MDAQMD Regulation II and Regulation XIII unless the equipment involved in the change is exempt from obtaining such permits and approvals pursuant to the provisions of Rule 219; and	Change acronym in condition on Title V renewal for 2010 to reflect MDAQMD.	Acronym in condition is incorrect this should refer to MDAQMD not Antelope Valley.

